

# **READING BOROUGH LOCAL PLAN PARTIAL UPDATE – DUTY TO CO-OPERATE STATEMENT**

**May 2025**

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# 1. Introduction

## 1.1 The duty to co-operate

1.1.1 There is a legal duty on local planning authorities, county councils and some other bodies to co-operate on planning for sustainable development, which is contained in Section 33A of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011. This is widely known as the 'duty-to-cooperate' and has quickly become one of the most important considerations in plan-making, and the main vehicle for considering matters of greater than local significance since the demise of regional planning.

1.1.2 The duty requires local authorities to engage constructively, actively and on an ongoing basis in the preparation of development plans so far as they relate to 'strategic matters'. Strategic matters are defined as:

*"(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have significant impact on at least two planning areas;*

*And (b) sustainable development or use of land in a two-tier area if the development or use-*

*(i) Is a county matter, or*

*(ii) Has or would have a significant impact on a county matter."*

1.1.3 These matters can be far reaching. The geographical extent of co-operation will vary depending on the issue. For example, whilst Reading has strong links with neighbouring authorities within Berkshire, the degree of linkage with some of the other consultation bodies is lower. Therefore, each approach to co-operation has been tailored depending on the nature of the matter.

1.1.3 In addition to local planning authorities, the following organisations are also subject to the duty to co-operate:

- the Environment Agency;
- Historic England;
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- Homes England;
- integrated care boards;
- NHS England;
- the Office of Rail and Road;
- Transport for London;
- Integrated Transport Authorities;
- highways authorities; and
- the Marine Management Organisation

1.1.4 In addition, Local Enterprise Partnerships and Local Nature Partnerships are not subject to the duty themselves, but local planning authorities must co-operate with those organisations when drawing up local plans.

- 1.1.5 Whether the local planning authority has complied with the duty is the first issue an Inspector will consider in examining a development plan, and where the duty has not been complied with, plans will not be successful at examination. The duty to co-operate does not require agreement with other partners, rather the local authority must demonstrate it has made every effort to engage constructively on strategic matters. Duty to co-operate is an ongoing process and will not cease once the Local Plan is adopted.
- 1.1.6 The National Planning Policy Framework provides more detail on how the duty is to be exercised and particularly notes the following strategic priorities that will be matters to which the duty must be applied where they have cross-boundary implications:
- *“the homes and jobs needed in the area;*
  - *The provision of retail, leisure and other commercial development;*
  - *The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
  - *The provision of health, security, community and cultural infrastructure and other local facilities; and*
  - *Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.”* (paragraph 156)
- 1.1.7 Co-operation as set out in the duty is much more than simply consulting the other specified bodies, rather it involves extensive, ongoing co-operation throughout the plan-making process on strategic matters.
- 1.1.8 More information on the duty to co-operate and how it should be applied in practice is contained in National Planning Practice Guidance<sup>1</sup>.
- 1.1.9 The duty to co-operate is not a duty to agree, rather the local authority must demonstrate that it has made every effort to work closely with identified partners. The duty to co-operate is ongoing and does not end with the adoption of the Local Plan.

## **1.2 Purpose of this statement**

- 1.2.1 The purpose of this statement is to identify and describe duty to co-operate actions that have occurred during the preparation of the Local Plan Partial Update and demonstrate that the duty has been complied with. This statement identifies any cross boundary or strategic issues and describes their consideration with adjoining authorities, specified bodies and other organisations. This forms part of the evidence base for the local plan.
- 1.2.2 Section 2 describes the most significant measures that have taken place under the duty to co-operate, and demonstrates how the duty has been complied with. The appendices contain evidence of co-operation, including a more detailed chronological list of duty to co-operate actions that have taken place (Appendix 2).
- 1.2.3 This statement will be kept up to date as the process of preparing the Local Plan Partial Update continues, and it will be submitted along with other important evidence to support the plan at examination. There is also a requirement to make information on how the Council has complied with the duty available on a regular basis, and the Annual Monitoring Report, published in December each year, summarises the duty to co-operate measures undertaken during each monitoring year.

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<sup>1</sup> [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/plan-making)

## 1.3 Local context

- 1.3.1 Reading Borough cannot be viewed in isolation from its wider context. Reading forms the core of an urban area that includes areas that are effectively suburbs of Reading within Wokingham Borough and West Berkshire District, and extends to the towns of Wokingham (in Wokingham Borough) and Bracknell (within Bracknell Forest Borough). South Oxfordshire District to the north is more rural in nature and the Reading Borough boundary forms an edge to the urban area.
- 1.3.2 The Berkshire local authorities have a long history of working together. After Berkshire County Council was abolished in 1998, and unitary status was conferred upon the six Berkshire authorities (West Berkshire District Council, Reading Borough Council, Wokingham Borough Council, Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead and Slough Borough Council), a Joint Strategic Planning Committee was set up, supported by a Joint Strategic Planning Unit. This had responsibility for the production of the joint Berkshire Structure Plan (adopted in 2005) as well as other strategic matters such as minerals and waste planning policy. The six authorities met in various forms to discuss these matters under these arrangements, and many of these arrangements have continued after the Joint Committee and Joint Unit were abolished in 2010. This included regular scheduled meetings of Heads of Planning and Planning Policy leads.
- 1.3.3 Authorities across the local area are at quite different stages of plan production. The various authorities are at the following stages of plan production at the time of writing:
- Wokingham Borough Council: Consultation on the Local Plan Update: Proposed Submission Plan (Regulation 19) took place between September and November 2024. The plan was submitted on 28<sup>th</sup> February 2025.
  - West Berkshire District Council: The Local Plan Review was submitted on 31<sup>st</sup> March 2023. The inspector's report was received on 8<sup>th</sup> April 2025.
  - South Oxfordshire and Vale of White Horse District Councils: The Councils are preparing a Joint Local Plan 2041, a Publication version of which was published for consultation under Regulation 19 between October and November 2024. The plan was submitted on 9<sup>th</sup> December 2024.
  - Bracknell Forest Borough Council: Local Plan adopted on 19<sup>th</sup> March 2024
  - Royal Borough of Windsor and Maidenhead: Local Plan adopted on 8<sup>th</sup> February 2022.

## 1.4 Identifying strategic matters and duty to co-operate partners

- 1.4.1 The Council has produced a Duty to Co-operate Scoping Strategy, the most recent version of which dates from December 2015<sup>2</sup>. Although this is now nine years old, the strategic matters that it identifies remain broadly relevant. Engagement under the duty has therefore continued to follow the Statement, but there has needed to be some adaption to reflect relevant changes. The most important such changes include;
- Changes to the prescribed bodies in the Regulations, in particular 2023 changes to refer to the integrated care boards and NHS England.
  - The creation of Buckinghamshire Council as a combined authority which replaces the four districts and the county council, of which Buckinghamshire County Council, South Bucks District Council and Wycombe District Council are referred to in the 2015 Statement.
  - The 2020 extension of the Detailed Emergency Planning Zone for AWE Burghfield has increased the importance of this issue in local planning in Reading, and strengthened the

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<sup>2</sup> [RBC\\_Duty\\_to\\_Cooperate\\_Scoping\\_Strategy\\_1215.pdf](#)

need for joint working with other authorities affected by the DEPZ on planning and emergency planning matters.

- National policy has moved away from the concept of housing market areas and functional geographies as a basis for undertaking joint working, but those areas formerly within the Western Berkshire Housing Market Area (West Berkshire, Wokingham and Bracknell Forest) continue to represent the closest functional links that Reading has alongside South Oxfordshire, which means that the most extensive duty to co-operate work still takes place within this area.
- National policy requires the identification of strategic policies, which are those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues). Areas highlighted as strategic in the NPPF do not include any areas that were not already identified as strategic matters in the 2015 Statement. The Pre-Submission Draft Local Plan Partial Update identifies relevant policies as strategic.
- Engagement with the Mayor of London was identified in the 2015 Statement, in particular due to specific issues with how migration was being dealt with in respective authorities' housing evidence. This issue is no longer a part of Reading's housing need evidence, and, although the Mayor of London remains a consultee, the need to engage under the duty to co-operate is not as prevalent.

1.4.2 The content of the 2015 Statement is therefore considered to remain largely relevant, albeit with some adaptations as set out above. The strategic matters have not changed, but there have been some adaptations to the partners that are relevant to each issue, and Appendix 1 sets out a revised list.

## 2. Description of main duty to co-operate measures

2.0.1 The following section sets out the most important projects or vehicles that demonstrate how the duty to co-operate has been complied with during the period of preparing the Local Plan Partial Update. It is not an exhaustive list of all duty to co-operate measures undertaken.

### 2.1 Statements of common ground

2.1.1 The Council has generally signed Statements of Common Ground (SoCG) with key duty to co-operate partners in the past, and the existing Local Plan is subject to a wide-ranging SoCG with Bracknell Forest Borough Council, West Berkshire Council and Wokingham Borough Council. This SoCG was most recently updated in August 2021. However, this existing SoCG is relevant only to that adopted plan (in particular on matters such as housing needs) and a new statement or statements were necessary for the Partial Update.

2.1.2 Four Statements of Common Ground have been prepared that relate specifically to the Local Plan Partial Update:

- A Statement of Common Ground was signed on 9<sup>th</sup> December 2024 with South Oxfordshire and Vale of White Horse District Councils, who are preparing a joint local plan. The statement covers the preparation of both the South and Vale Joint Local Plan and the Reading Borough Local Plan Partial Update. It covers matters including housing need and infrastructure provision. It is included as Appendix 5.
- A Statement of Common Ground was signed on 8<sup>th</sup> May with Wokingham Borough Council, relating to the preparation of the Reading Local Plan Partial Update, covering a wide range of strategic matters including development needs and transport impacts. It is included as Appendix 6. A separate SoCG was prepared that relates to Wokingham's Local Plan, which was also submitted in 2025.
- A Statement of Common Ground was signed on 8<sup>th</sup> May 2025 with West Berkshire District Council, again relating to the preparation of the Partial Update and covering a range of matters including development needs. It is included as Appendix 7.
- A Statement of Common Ground was signed on 6<sup>th</sup> May 2025 with Bracknell Forest Council specifically relating to the Partial Update and covering matters including respective levels of development needs. It is included as Appendix 8.

2.1.3 **Relevant strategic matters:** Various

2.1.4 **Relevant duty to co-operate partners:** Bracknell Forest Council, South Oxfordshire District Council, Vale of White Horse District Council, West Berkshire District Council, Wokingham Borough Council.

### 2.2 Housing Needs Assessment

2.2.1 In August 2023, the Council commissioned Opinion Research Services (ORS) to undertake a Housing Needs Assessment (HNA) for Reading. The aim was to assess the overall need for housing in Reading and understand how this relates to the need generated by the standard methodology, as well as assessing the need for different groups requiring housing.

2.2.2 Past evidence on housing needs (the Strategic Housing Market Assessment) had been undertaken jointly across the Berkshire authorities. However, there was no opportunity to do this on this occasion given the different stages of plan-making.

2.2.3 The need to comply with the duty to co-operate was built into the process. As findings started to emerge, on 19<sup>th</sup> March 2024, ORS facilitated an online workshop to which all authorities that the

Scoping Statement lists as duty to co-operate partners on strategic housing were invited<sup>3</sup>. In the event, eight authorities<sup>4</sup> attended the event. The workshop outlined the methodology for the HNA, and presented emerging findings about the overall level of housing need. The workshop included a question and answer session.

- 2.2.4 As a follow-up, when a full draft report was available on 25<sup>th</sup> July 2024, it was sent to the same authorities that were invited to the workshop for their comment. No formal comments on the draft was received, although there was a response from Oxfordshire County Council seeking further information on RBC's approach to housing needs.
- 2.2.5 The HNA was signed off in September 2024.
- 2.2.6 **Relevant strategic matters:** Housing needs and provision
- 2.2.7 **Relevant duty to co-operate partners:** Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Homes England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, South Oxfordshire District Council, Swindon Borough Council, Surrey Heath Borough Council, Test Valley District Council, West Berkshire District Council, Wiltshire County Council, Wokingham Borough Council.

## 2.3 Reading's housing needs

- 2.3.1 Although the Local Plan Partial Update bases its level of housing need on the findings of the HNA, which can be fully met within Reading's boundaries, it was nonetheless considered necessary to make a request to neighbouring authorities under the duty to co-operate to understand the position if the Partial Update were to be based on the outcome of the standard methodology. The standard methodology at the time (2024) produced a level of need of 878 homes per year for Reading, whilst the assessed capacity at the time was 825 homes per year, which would mean that there would be an unmet need of 954 homes over the plan period to 2041.
- 2.3.2 Therefore, on 23<sup>rd</sup> August 2024 RBC wrote to all local planning authorities within 10 km of the RBC boundaries to understand whether there would be scope to accommodate any unmet needs that would arise should the Partial Update be based on the standard methodology. The letter is included as Appendix 3.
- 2.3.3 Responses were received from eight of the nine authorities contacted. The responses are set out in Appendix 4. In general, no responses identified any scope to meet any unmet needs that would arise from Reading. A brief summary of the responses is below, but please see the full text of the responses in the Appendix for the full picture of each authority's position.
- **Basingstoke and Deane Borough Council (responded on 2<sup>nd</sup> September):** no scope to accommodate unmet needs due to the high levels of need within the authority and the availability of sites, and the current stage of the Local Plan takes a stepped approach to growth due to concerns about availability of infrastructure to support growth.
  - **Bracknell Forest Borough Council (responded on 17<sup>th</sup> September):** considered premature to be agreeing need issues when RBC is planning to meet its needs in full. Also,

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<sup>3</sup> Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Homes England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, South Oxfordshire District Council, Swindon Borough Council, Surrey Heath Borough Council, Test Valley District Council, Thames Valley Berkshire Local Enterprise Partnership, Vale of White Horse District Council, West Berkshire District Council, Wiltshire County Council, Wokingham Borough Council.

<sup>4</sup> Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Oxfordshire District Council, Vale of White Horse District Council, Wokingham Borough Council



flexibility within the adopted Bracknell Forest Local Plan has been reduced by Inspector's removal of sites, and viability issues are also affecting delivery, meaning that there is unlikely to be any ability to accommodate needs.

- **Buckinghamshire Council (responded on 30<sup>th</sup> August):** due to the stage of plan preparation along with uncertainties around the NPPF is it not possible to confirm whether there would be any capacity to accommodate unmet needs, and in any case there is a weak relationship between Reading and Buckinghamshire that may mean accommodating Reading's unmet needs is inappropriate.
- **Hart District Council (responded on 20<sup>th</sup> September):** no scope to accommodate unmet needs for a variety of reasons including that unmet needs from Surrey Heath are already being met in Hart, uncertainty around future numbers and resulting unmet need from adjoining authorities and relatively weak relationship of Hart and Reading when compared to other authorities.
- **Royal Borough of Windsor and Maidenhead (responded on 19<sup>th</sup> September):** No scope to accommodate unmet needs, as the Local Plan met its local housing need at the time in full only by Green Belt release, and figures would increase under current standard method and much more significantly under the proposed new method.
- **South Oxfordshire and Vale of White Horse District Council (responded on 17<sup>th</sup> September):** work on Joint Local Plan has not made any provision for meeting unmet needs from Reading as discussions had been on the basis of Reading meeting its own needs, and there should be a joint exploration of alternatives before any such provision would be made. South and Vale already engage with Oxford City Council around their unmet need.
- **West Berkshire District Council (responded on 16<sup>th</sup> September):** not in a position to assist with unmet needs, as the West Berkshire Local Plan is at examination and WBDC have needed to identify additional provision in response to the Inspector identifying a shortfall against needs, and some of this provision is subject to further work to inform allocations later in the plan period.
- **Wokingham Borough Council (responded on 25<sup>th</sup> October):** Note that, according to the NPPF, the urban uplift should be accommodated within the cities and urban centres unless there are voluntary cross boundary redistribution agreements in place, or where it would conflict with NPPF policies, and, as the base methodology can be accommodated within Reading, there is no requirement to seek to export the urban uplift. Any delivery in Wokingham is highly dependent on greenfield land which would conflict with the purpose of the urban uplift. Housing supply in the Local Plan is not sufficient to accommodate unmet need from other authorities. Also note the significant increases that would result from the proposed new standard methodology which would exceed capacity.

2.3.4 The only authority that did not respond was Surrey Heath Borough Council, and as noted above, Surrey Heath has its own unmet housing needs that Hart District Council are in co-operation over.

2.3.5 As a result, it is clear that there is no scope to meet any unmet need from Reading in any of the adjoining or nearby authorities, should that unmet need arise through use of the standard method. At the point of submission, it is worth noting that no unmet needs would arise on the basis of the most recent published figures.

2.3.6 **Relevant strategic matters:** Housing needs and provision.

2.3.7 **Relevant duty to co-operate partners:** Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of

Windsor and Maidenhead, South Oxfordshire and Vale of White Horse District Councils, Surrey Heath Borough Council, West Berkshire District Council, Wokingham Borough Council.

## 2.4 Commercial Needs Assessment

- 2.4.1 In January 2024, the Council commissioned Lambert Smith Hampton to prepare a Commercial Needs Assessment to assess the level of need for commercial uses in Reading over the plan period. This was to cover employment uses including offices, industrial and warehouses as well as retail and built leisure uses.
- 2.4.2 As for housing needs, past evidence had been prepared jointly with neighbouring Berkshire authorities, but was not possible on this occasion due to differing plan-making stages.
- 2.4.3 When a full draft became available on 12<sup>th</sup> November 2024, it was provided to all adjoining authorities as well as Bracknell Forest Council and the Royal Borough of Windsor and Maidenhead (both identified as being within the same functional economic market area as Reading in the evidence supporting the adopted Local Plan) and Thames Valley Berkshire Local Enterprise Partnership for comment. No comments were received.
- 2.4.4 **Relevant strategic matters:** Need and provision for economic development and town centres
- 2.4.5 **Relevant duty to co-operate partners:** Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead, South Oxfordshire District Council, Thames Valley Berkshire Local Enterprise Partnership, West Berkshire District Council, Wokingham Borough Council.

## 2.5 Transport Modelling

- 2.5.1 Stantec were commissioned in March 2024 to provide transport evidence for the Partial Update, including transport modelling work. At the point that the Pre-Submission Draft version of the Partial Update was published, a full report of the transport modelling was not available, which is an issue that was raised in representations, including a duty to co-operate objection from Wokingham Borough Council (see section 3).
- 2.5.2 A full draft of the Transport Modelling report was completed on 14<sup>th</sup> April 2025, and was provided to National Highways, Wokingham Borough Council, West Berkshire District Council, South Oxfordshire District Council, Bracknell Forest Council and Oxfordshire County Council for an opportunity to comment. A comment was received from West Berkshire District Council relating to the inclusion of a local plan site in West Berkshire within the assessment, which was dealt with by way of a separate addendum report. Comments were also received from National Highways which led to some changes to the report. Bracknell Forest Council, South Oxfordshire District Council and Wokingham Borough Council confirmed that they had no concerns regarding the results, with Wokingham then withdrawing their duty to co-operate objection.
- 2.5.3 **Relevant strategic matters:** Strategic transport infrastructure needs and provision
- 2.5.4 **Relevant duty to co-operate partners:** Bracknell Forest Borough Council, National Highways, Oxfordshire County Council, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council.

## 2.6 Unmet needs from other authorities

- 2.6.1 Since the adoption of the existing Local Plan, RBC has received duty to co-operate requests relating to unmet needs from other authorities as follows:
- 27<sup>th</sup> January 2020 – request from Elmbridge Borough Council relating to unmet housing needs;

- 31<sup>st</sup> August 2021 – request from Bracknell Forest Borough Council relating to unmet industrial and warehouse floorspace need;
- January 2023 – request from West Berkshire District Council relating to unmet employment floorspace need;
- 29<sup>th</sup> November 2023 – request from Wokingham Borough Council relating to unmet need for gypsy and traveller accommodation.

- 2.6.2 In terms of housing, the Pre-Submission Draft Local Plan Partial Update is based on a need of 735 dwellings per year and provides for 825 dwellings per year, which over the full plan period results in 1,620 dwellings over and above the need. In theory, should this approach be found sound, this oversupply could form a contribution to unmet needs from elsewhere. However, at this stage, the only request that Reading has received is from Elmbridge. The Elmbridge Local Plan is currently at examination, and a letter from the Inspector dated 11 September 2024 makes clear that the plan is currently unsound in part because it is undertaken on a brownfield only basis and does not consider the release of Green Belt land. As such, it is not clear what the extent of any unmet needs arising from Elmbridge, if any, will be. In addition, Elmbridge is, at its closest point, over 30 km from Reading's boundary and there is little to suggest that there is any particular functional relationship. As such, no provision is made for meeting unmet housing needs from elsewhere.
- 2.6.3 In terms of employment, the level of need for both office and industrial/warehouse uses in Reading as evidenced by the Commercial Development Needs Assessment are high. The Local Plan Partial Update makes provision to meet its needs in full, but the capacity identified through the HELAA and other evidence does not allow any provision over and above Reading's own needs, meaning that unmet needs from other authorities cannot be accommodated. This changes the position somewhat from the adopted version of the Local Plan, where planned supply of office space exceeded the identified needs, and the Plan identified that this could potentially form a contribution to unmet needs from other authorities in the Central Berkshire Functional Economic Market Area (an area covering Reading, Wokingham, Bracknell Forest and Windsor and Maidenhead).
- 2.6.4 Finally, in terms of sites for gypsies and travellers, RBC undertook an exhaustive search of potential sites for both permanent and transit sites in preparing the existing Local Plan, which did not result in any suitable sites being identified, meaning that Reading has existing unmet needs. This process was refreshed on the basis of a different approach to flood risk for transit accommodation (on the assumption that transit accommodation would be a 'more vulnerable' use under the NPPF) and this led to a planning permission being granted for a transit site, but this would not have assisted in finding permanent sites due to those uses being classed as 'highly vulnerable'. No sites have arisen since the Local Plan was prepared that could meet either Reading's unmet need or any unmet need from other authorities.
- 2.6.5 **Relevant strategic matters:** Housing needs and provision, need and provision for gypsies and travellers, need and provision for economic development and town centres
- 2.6.6 **Relevant duty to co-operate partners:** Bracknell Forest Borough Council, Elmbridge Borough Council, West Berkshire District Council, Wokingham Borough Council.

## 2.7 Engagement with healthcare providers

- 2.7.1 Integrated care boards, in this case the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOBICB), are prescribed duty to co-operate partners, as is NHS England, although in practice engagement on plan making primarily also involves the Royal Berkshire NHS Foundation Trust. RBC has made a particular effort to engage with both the ICB in terms of

primary healthcare and the Trust in terms of acute healthcare whilst preparing the Local Plan, particularly in view of recognised issues in access to primary care and the potential move of the Royal Berkshire Hospital.

### **Integrated Care Board**

- 2.7.2 In terms of the ICB, planning officers met with representatives of the ICB on five occasions during 2023 and 2024, primarily to gain input for the Infrastructure Delivery Plan that accompanies the Local Plan, with the aim of a better understanding of where primary healthcare needs would arise in Reading and what form of provision would be needed. Research and data have also been shared between the ICB and Council on the capacity of the existing estate and how expected levels of development would impact on that capacity. The results of these discussions have informed the development of the Local Plan and Infrastructure Delivery Plan, as well as the ICB's formal input into the consultation which has resulted in a new policy on health impact assessment and identifying opportunities within the development allocations for on-site facilities.

### **Royal Berkshire NHS Foundation Trust**

- 2.7.3 There has also been significant engagement with the Trust, beginning in September 2023 and including eight meetings. Most recently, some of these meetings have included Wokingham Borough Council due to the location of potential alternative sites within Wokingham Borough.
- 2.7.4 The main issues that have been discussed in these meetings are the possible relocation of the hospital, the future of the existing site if the hospital were to relocate or would need to be redeveloped in situ including modern requirements, opportunities for RBH staff housing within the Borough and reconfigurations of the overall delivery model. The Council has sought to engage on any proposal to move the hospital, including providing input to the search for a potential alternative site.
- 2.7.5 Of particular relevance for the Local Plan is policy ER3 on the Royal Berkshire Hospital site on London Road, and officers have sought clarity about the future of this site insofar as is possible given that decisions are dependent upon the outcome of government funding decisions under the New Hospitals Programme. The policy has therefore been drafted against a background of uncertainty but with close co-operation with the Trust, including provision of a draft policy for comment prior to Pre-Submission consultation.
- 2.7.6 **Relevant strategic matters:** Strategic healthcare infrastructure needs and provision
- 2.7.7 **Relevant duty to co-operate partners:** Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board, NHS England

## **2.8 Central and Eastern Berkshire Joint Minerals and Waste Local Plan**

- 2.8.1 Reading Borough Council has worked with three neighbouring authorities – Wokingham Borough Council, Bracknell Forest Borough Council and the Royal Borough of Windsor and Maidenhead – on a Joint Minerals and Waste Local Plan to cover the area. Whilst compliance with the duty to co-operate was separately assessed in the examination for that plan, and it does not therefore formally represent a duty to co-operate measure for the Reading Local Plan, it is nevertheless important context, as it demonstrates that Reading's decision not to cover minerals and waste issues within its own Local Plan was taken in view of that co-operation.
- 2.8.2 Briefly, the four authorities entered into a Joint Working Agreement with Hampshire County Council to undertake the function of provision of a minerals and waste plan. Production of the plan commenced in 2016, and the plan was adopted by all four authorities, with final adoption

being in January 2023. Further information is available on the dedicated website for the Minerals and Waste Local Plan<sup>5</sup>.

2.8.3 **Relevant strategic matters:** Planning for minerals, planning for waste

2.8.4 **Relevant duty to co-operate partners:** Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead, Wokingham Borough Council, other duty to co-operate partners.

## 2.9 Other Measures

2.9.1 There are a range of other measures that have helped to fulfil the duty to co-operate during plan preparation. The chronological list in Appendix 2 sets out all significant actions that have been taken during the period. In many cases, there were specific meetings organised to deal with specific or general duty to co-operate matters.

2.9.2 There are also a number of existing working arrangements across the six Berkshire unitary authorities, dating back many years before the Localism Act established the Duty. There is a strong tradition of joint working across the area, with the six authorities having jointly prepared a Berkshire Structure Plan (adopted in 2005), and having also worked jointly in progressing joint minerals and waste plans. The regular meetings that are part of these arrangements include Berkshire Heads of Planning and Development Plans Group (DPG), comprising the lead planning policy officers from each authority. Whilst these meetings are not duty to co-operate meetings as such, in practice these meetings, particularly Development Plans Group, provide a vehicle to discuss duty to co-operate issues and to identify matters where joint working is required.

2.9.3 All significant measures under the duty to co-operate are listed chronologically in Appendix 2.

2.9.4 **Relevant strategic matters:** All

2.9.5 **Relevant duty to co-operate partners:** All.

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<sup>5</sup> [Central and Eastern Berkshire - Joint Minerals & Waste Plan | Hampshire County Council \(hants.gov.uk\)](https://hants.gov.uk/minerals-waste-plan)

### **3. Duty to co-operate representations**

#### **3.1 Representations at Regulation 18 stage**

- 3.1.1 Any representations that have raised particular issues relating to the duty to co-operate at the Regulation 18 (Consultation on Scope and Content) stage are summarised below. Unsurprisingly, at this stage very few issues were raised.

##### **Representations from duty to co-operate partners**

- 3.1.2 There were no representations from duty to co-operate partners at Regulation 18 stage that raised duty to co-operate concerns.

##### **Representations from others**

- 3.1.3 There were a small number of representations from other organisations that specifically referenced the duty to co-operate at this stage. In all cases, the reference was in the context of planning for housing needs, highlighting that the Council must work with its neighbours under the duty if its housing needs cannot be met.
- 3.1.4 The Home Builders Federation noted that, under the NPPF, the Council must seek voluntary arrangements with neighbouring authorities under the duty to co-operate if Reading's housing needs under the standard methodology cannot be met. Both Fairfax and Gladman made similar points specifically in relation to engaging with South Oxfordshire District Council, whilst TOWN noted the need to engage with West Berkshire District Council, as well as stating that the fact that no adjoining local plans made specific provision for Reading's unmet needs under the adopted plan represented a failure under the duty.

#### **3.2 Representations at Regulation 19 stage**

- 3.2.1 Any representations highlighting duty to co-operate concerns at Pre-Submission (Regulation 19) are described below.

##### **Representations from duty to co-operate partners**

- 3.1.2 A duty to co-operate objection was received from Wokingham Borough Council at Regulation 19 stage. This related to the absence of a full transport assessment at that stage to demonstrate that the plan is effective, meaning that WBC did not consider that the duty to co-operate had been discharged at that stage. The response set out the intention to work proactively with RBC to confirm that the duty had been met and the plan was sound prior to submission.
- 3.1.3 A full draft of the Transport Modelling report to support the Partial Update was provided to WBC, along with other relevant duty to co-operate partners, on 14<sup>th</sup> April 2025. This demonstrated that there would be very limited cross-boundary transport impacts as a result of the Partial Update. On the basis of this, WBC formally withdrew their duty to co-operate objection on 1<sup>st</sup> May. This is confirmed in the Statement of Common Ground between WBC and RBC (Appendix 6).

##### **Representations from others**

- 3.1.4 As at Regulation 18 stage, there were a small number of representations from others which took the position that RBC had failed the duty to co-operate. Again, these were in the context of housing needs.
- 3.1.5 The Home Builders Federation once again raised duty to co-operate issues, The HBF acknowledged that co-operation had taken place (albeit considering that Statements of Common Ground should have been prepared and signed at an earlier stage), but considered that the

premise of the co-operation, which is that there would be no unmet housing needs from Reading, was flawed and that the co-operation that has taken place is not therefore effective.

- 3.1.6 Both Gladman and USS Investment Management Limited made comments in relation to a perceived failure to co-operate with authorities to the north of Reading. Gladman considered that the area covered by the West of Berkshire Housing Market Area would likely have unmet housing needs as a whole and RBC would therefore likely rely on provision within South Oxfordshire to meet unmet needs, and had not effectively engaged on this ahead of the Regulation 19 consultation. USS referred to an absence of effective engagement with South Oxfordshire District Council and Vale of White Horse District Council around accommodating unmet needs from Reading should this arise.
- 3.1.7 Full responses to individual comments are included within the relevant Statement of Consultation, but RBC does not consider that these matters amount to a failure to comply with the duty to co-operate.





## Appendix 1: Summary of strategic matters and relevant duty to co-operate bodies

A1.1 This table lists the strategic matters and those duty to co-operate bodies that have identified as being potentially relevant. Please note that, depending on the degree to which the strategic matter is addressed, not all duty to co-operate bodies listed will be relevant.

**Table A1.1: List of strategic matters and relevant duty to co-operate bodies**

Strategic matter	Relevant duty to co-operate bodies
Housing needs and provision	<p><b>Main bodies:</b> Bracknell Forest Borough Council, Homes England, Oxfordshire County Council, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council</p> <p><b>Other bodies (as required):</b> Basingstoke and Deane Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, Surrey County Council, Surrey Heath Borough Council, Swindon Borough Council, Test Valley Borough Council, Thames Valley Berkshire Local Enterprise Partnership, Vale of White Horse District Council, Wiltshire Council</p>
Needs and provision for gypsies and travellers	Bracknell Forest Borough Council, Homes England, Oxfordshire County Council, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Needs and provision for economic development and town centres	<p><b>Main bodies:</b> Bracknell Forest Borough Council, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, South Oxfordshire District Council, Thames Valley Berkshire Local Enterprise Partnership, West Berkshire District Council, Wokingham Borough Council</p> <p><b>Other bodies (as required):</b> Basingstoke and Deane Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Rushmoor Borough Council, Slough Borough Council, Surrey County Council, Surrey Heath Borough Council, Swindon Borough Council, Test Valley Borough Council, Vale of White Horse District Council, Wiltshire Council</p>
Strategic transport infrastructure needs and provision	<p><b>Main bodies:</b> Bracknell Forest Borough Council, National Highways, Office of Rail and Road, Oxfordshire County Council, South Oxfordshire District Council, Thames Valley Berkshire Local Enterprise Partnership, West Berkshire District Council, Wokingham Borough Council</p> <p><b>Other bodies (as required):</b> Basingstoke and Deane Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, Surrey County Council, Surrey Heath Borough Council, Swindon Borough Council, Test Valley Borough Council, Vale of White Horse District Council, Wiltshire Council</p>
Strategic education infrastructure needs and provision	Oxfordshire County Council, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Strategic healthcare infrastructure needs and provision	Bracknell Forest Borough Council, Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board, NHS England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Strategic landscape considerations	Natural England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council

Strategic matter	Relevant duty to co-operate bodies
Strategic biodiversity considerations	Berkshire Local Nature Partnership, Natural England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Strategic flooding considerations	Environment Agency, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Climate change and mitigation	As required from Basingstoke and Deane Borough Council, Berkshire Local Nature Partnership, Buckinghamshire Council, Environment Agency, Hampshire County Council, Hart District Council, Natural England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, South Oxfordshire District Council, Surrey County Council, Surrey Heath Borough Council, Swindon Borough Council, Test Valley Borough Council, Thames Valley Berkshire Local Enterprise Partnership, Vale of White Horse District Council, West Berkshire District Council, Wiltshire Council, Wokingham Borough Council
Open space and recreation provision	South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Historic environment	<b>Main body:</b> Historic England <b>Other body (as required):</b> West Berkshire District Council
Tall buildings and strategic views	Civil Aviation Authority, Historic England, South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
Utilities infrastructure needs and provision	South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council
University of Reading	Wokingham Borough Council
Planning within the Detailed Emergency Planning Zone for AWE Burghfield	Basingstoke and Deane Borough Council, West Berkshire District Council, Wokingham Borough Council
Planning for minerals	Bracknell Forest Borough Council, Buckinghamshire Council, Environment Agency, Hampshire County Council, Marine Management Organisation, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, Surrey County Council, West Berkshire District Council, Wokingham Borough Council
Planning for waste	Bracknell Forest Borough Council, Buckinghamshire Council, Environment Agency, Hampshire County Council, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, Surrey County Council, West Berkshire District Council, Wokingham Borough Council

## Appendix 2: Chronology of events relevant to the duty to co-operate

**Table A1.2: Chronology of significant duty to co-operate events**

Date	Measure
7 <sup>th</sup> October 2022	Duty to co-operate meeting with West Berkshire District Council to discuss WBDC's unmet employment needs
13 <sup>th</sup> June 2023	Meeting with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board regarding primary care needs in Reading
12 <sup>th</sup> September 2023	Meeting with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board regarding primary care needs in Reading
13 <sup>th</sup> September 2023	Meeting with RBH NHS Foundation Trust regarding the future of Royal Berkshire Hospital and primary care
22 <sup>nd</sup> September 2023	Duty to co-operate meeting with Wokingham Borough Council
6 <sup>th</sup> October 2023	Duty to co-operate meeting with South Oxfordshire District Council
18 <sup>th</sup> October 2023	Duty to co-operate meeting with West Berkshire District Council
31 <sup>st</sup> October 2023	Duty to co-operate meeting with Bracknell Forest Borough Council
1 <sup>st</sup> November 2023	Duty to co-operate meeting with Wokingham Borough Council
2 <sup>nd</sup> November 2023	Duty to co-operate meeting with Oxfordshire County Council
27 <sup>th</sup> November 2023	Consultation commences on the Local Plan Partial Update: Consultation on Scope and Content
29 <sup>th</sup> November 2023	Duty to co-operate request received from Wokingham Borough Council with regard to unmet needs for gypsy and traveller accommodation
30 <sup>th</sup> November 2023	RBC responds to duty to co-operate request from Wokingham Borough Council with regard to unmet needs for gypsy and traveller accommodation
30 <sup>th</sup> November 2023	Duty to co-operate meeting with Basingstoke and Deane Borough Council
22 <sup>nd</sup> January 2024	Meeting with RBH NHS Foundation Trust regarding the future of Royal Berkshire Hospital
31 <sup>st</sup> January 2024	Consultation closes on the Local Plan Partial Update: Consultation on Scope and Content
11 <sup>th</sup> March 2024	Meeting with RBH NHS Foundation Trust to discuss transport assessment work for the Royal Berkshire Hospital
19 <sup>th</sup> March 2024	Duty to co-operate workshop on Housing Needs Assessment, presenting methodology and draft headline results, attended by Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Oxfordshire District Council, Vale of White Horse District Council, Wokingham Borough Council
15 <sup>th</sup> May 2024	Meeting with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board regarding primary care needs in Reading
22 <sup>nd</sup> May 2024	Meeting with Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board regarding primary care needs in Reading
2 <sup>nd</sup> July 2024	Meeting with Historic England to discuss the relationship between sustainability policies and heritage assets.
24 <sup>th</sup> July 2024	Duty to co-operate meeting with Wokingham Borough Council

Date	Measure
25 <sup>th</sup> July 2024	Copy of draft Housing Needs Assessment sent for comments to the following: Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hampshire County Council, Hart District Council, Homes England, Oxfordshire County Council, Royal Borough of Windsor and Maidenhead, Rushmoor Borough Council, Slough Borough Council, Swindon Borough Council, Surrey Heath Borough Council, Test Valley District Council, West Berkshire District Council, Wiltshire County Council, Wokingham Borough Council. No comments on the draft received.
21 <sup>st</sup> August 2024	Meeting with RBH NHS Foundation Trust and Wokingham Borough Council regarding the future of Royal Berkshire Hospital
23 <sup>rd</sup> August 2024	Letter requesting information under the duty to co-operate on unmet needs in the event that the standard methodology for housing needs is used set to the following: Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Surrey Heath Borough Council, West Berkshire District Council, Wokingham Borough Council.
29 <sup>th</sup> August 2024	Meeting with RBH NHS Foundation Trust to discuss the future of the RBH site
30 <sup>th</sup> August 2024	Draft version of policy ER3: Royal Berkshire Hospital provided to Royal Berkshire Hospital NHS Foundation Trust for comment
30 <sup>th</sup> August 2024	Response from Buckinghamshire Council to the duty to co-operate request of 23 <sup>rd</sup> August.
2 <sup>nd</sup> September 2024	Response from Basingstoke and Deane Borough Council to the duty to co-operate request of 23 <sup>rd</sup> August.
9 <sup>th</sup> September 2024	Meeting with RBH NHS Foundation Trust as part of ongoing working group around the future of the hospital
18 <sup>th</sup> September 2024	Meeting with RBH NHS Foundation Trust as part of ongoing working group around the future of the hospital
11 <sup>th</sup> October 2024	Copy of draft Strategic Flood Risk Assessment provided to the Environment Agency for comment
6 <sup>th</sup> November 2024	Pre-Submission Draft Local Plan Partial Update consultation commences.
12 <sup>th</sup> November 2024	Draft of Commercial Needs Assessment shared with South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council, Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead and Thames Valley Berkshire Local Enterprise Partnership for comment. No comments on the draft received.
19 <sup>th</sup> November 2024	Comments received from the Environment Agency on the Strategic Flood Risk Assessment, which subsequently led to changes to the report
20 <sup>th</sup> November 2024	Meeting with RBH NHS Foundation Trust as part of ongoing working group around the future of the hospital
9 <sup>th</sup> December 2024	Statement of Common Ground signed with South Oxfordshire and Vale of White Horse District Councils.
17 <sup>th</sup> December 2024	Duty to co-operate objection relating to transport assessment received from Wokingham Borough Council.
18 <sup>th</sup> December 2024	Pre-Submission Draft Local Plan Partial Update consultation closes.

Date	Measure
14 <sup>th</sup> April 2025	Full draft of Transport Modelling report shared with National Highways, West Berkshire Council, Wokingham Borough Council, South Oxfordshire District Council, Oxfordshire County Council and Bracknell Forest Council.
22 <sup>nd</sup> April 2025	Comments on Transport Modelling report received from West Berkshire Council.
30 <sup>th</sup> April 2025	Initial comments on Transport Modelling report received from National Highways.
1 <sup>st</sup> May 2025	Withdrawal of Wokingham Borough Council's duty to co-operate objection relating to transport assessment.
6 <sup>th</sup> May 2025	Statement of Common Ground signed with Bracknell Forest Council
8 <sup>th</sup> May 2025	Statement of Common Ground signed with Wokingham Borough Council.
8 <sup>th</sup> May 2025	Statement of Common Ground signed with West Berkshire Council

### **Appendix 3: Duty to co-operate request relating to Reading's housing need**

Your contact is: Mark Worringham, Planning Section

Dear colleague,

**Re. Duty to co-operate request regarding housing needs**

I am writing to you on behalf of Reading Borough Council ("the Council") under the duty to co-operate in respect of Reading's housing needs. In this letter, we are asking you to tell us whether your authority would have any scope to accommodate any unmet housing need from Reading that would arise between 2023 and 2041 as a result of use of the current standard methodology in national policy, equating to a total of 954 dwellings.

**Background**

The Reading Borough Local Plan was adopted in November 2019. In line with statutory requirements, a review was carried out in March 2023 which determined that a Partial Update of the Local Plan was required, in particular due to changes to the approach to assessing housing need. A Regulation 18 consultation on Scope and Content was carried out between November 2023 and January 2024, and our Local Development Scheme (LDS) timetables a Pre-Submission Draft Local Plan Partial Update under Regulation 19 for November 2024.

Policy H1 (Provision of Housing) of the existing Local Plan is based on a need of 699 homes per year between 2013 and 2036. This was derived from the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) 2016. Policy H1 plans for 689 homes per year and identifies a shortfall of 230 dwellings over the plan period which is to be met within the Western Berkshire Housing Market Area. Any arrangements for meeting this shortfall outside Reading relate only to the level of need as calculated by the SHMA, not to any alternative calculations of need. It is worth noting that, as set out the housing trajectory in recent versions of our Annual Monitoring Report, we now expect that Reading will be able to meet all of the need of 699 homes per year within its own boundaries.

Under the current National Planning Policy Framework (NPPF), local housing need for Reading identified using the standard methodology would be 878 homes per year based on most recent figures. This includes a 35% uplift to need due to Reading being one of the 20 largest urban areas in England.

In 2023, Reading Borough Council commissioned consultants ORS to undertake a separate assessment of local housing needs, to understand the extent of genuine local housing need in Reading. The draft of this Housing Needs Assessment was shared with your authority on 25th July 2024. The report came to the conclusion that Reading's housing need is 735 homes per year between 2023 and 2041, and that there are exceptional circumstances why Reading should plan for this level of need rather than the local housing need under the standard methodology.

Reading's intended position was set out in the Regulation 18 consultation. The position was that the updated policy H1 will be based on the assessed need for 735 homes per year, but will plan to exceed this figure by providing for the assessed capacity of approximately 800 homes per year. This figure has now been refined by more detailed work since the consultation was undertaken using a Housing and Economic Land Availability Assessment (HELAA) based on a methodology agreed between five Berkshire authorities, and is now expected to be 825 homes per year. The intention is that the Regulation 19 version of the Partial Update will plan for provision of 825 homes per year compared to a need of 735 homes per year.

**It is therefore important to note that Reading's position is that its Partial Update will meet its housing needs in full, and that it does not intend that there will be unmet needs that neighbouring authorities need to accommodate.**

However, as you will no doubt be aware, the Council's approach to housing provision will be subject to significant scrutiny at examination, particularly given the requirement to demonstrate exceptional circumstances for an alternative approach to housing need. We are therefore keen to fully understand the implications of all eventualities, including if Reading's housing need were to be based on the standard methodology. For this reason, we are writing to you, along with all local planning authorities within 10km of Reading's boundaries, under the duty to co-operate to understand your authority's position in terms of any unmet needs that would arise from Reading if the standard methodology were to be used.

### ***Position regarding the consultation version of the NPPF***

A consultation on amendments to the NPPF was published in July. Under the proposed standard methodology contained within the consultation, as for many other authorities, local housing need would increase substantially for Reading, from 878 homes per year to 1,023. This is clearly a figure which exceeds the estimated capacity of the Borough.

The NPPF consultation lasts until 24th September. Therefore, at the time of writing, the proposals within the consultation remain subject to change. There are also proposed transitional arrangements, which will mean that some authorities that are at Regulation 19 stage may be able to proceed to examination under the existing NPPF, although those transitional arrangements are also subject to possible change.

For clarity, the request in this letter does not relate to the housing need derived from the proposed new standard methodology. If and when a new NPPF is in place, and if it affects Reading's emerging Local Plan Partial Update, the Council will need to consider its approach accordingly.

### ***Information requested***

As set out above, the Council's proposal is to base need levels on the results of the Housing Needs Assessment, which can be accommodated within our boundaries. However, in the event that the current standard methodology were to be used, the figure arising for Reading using latest figures in 2024 would be 878 dwellings per year. As set out above, Reading's capacity over the plan period 2023 to 2041 is considered to be 825 dwellings per year. This would mean an unmet need of 53 dwellings per year over the plan period, or 954 dwellings in total.

**We would like to know whether your authority would be in a position to accommodate any of this unmet need over some or all of the plan period, and if so, how much and when.**

We would be grateful for an answer to this request by **Monday 16 September**.

I am happy to have a further discussion about this content of this letter with you if it would be of help.

Please feel free to contact me if there are any queries.

Yours sincerely

Mark Worringham  
Planning Policy Manager



#### **Appendix 4: Responses to duty to co-operate request relating to Reading's housing need**

## **Basingstoke and Deane Borough Council**

Dear Mark

Thank you for your email regarding Duty to Co-operate and housing numbers. Your letter is helpful in setting out the current position in Reading.

The letter specifically asks whether, under the Duty to Cooperate, Basingstoke and Deane Borough Council is in a position to assist with meeting the housing needs of Reading. I can confirm, in response, that unfortunately the council does not have any scope to accommodate any unmet housing need from Reading that would arise between 2023 and 2041 as a result of use of the current standard methodology. This is in light of the current high housing number within this borough and the availability of suitable sites to deliver new homes.

We are currently in the early stages of updating the adopted Basingstoke and Deane Local Plan (2011-2029) and undertook a Regulation 18 consultation earlier in the year. This set out a spatial strategy for meeting the Borough's own housing needs in full but adopted a stepped approach due to concerns about the ability of local infrastructure to cope with the proposed high levels of growth (effectively allowing some infrastructure to catch up) and also due to the nature of the spatial strategy which, due to the high numbers involved, included large scale strategic sites which will take some time to deliver new homes on the ground. As noted in your letter, the Government recently published a draft new NPPF which proposed a significant increase in housing numbers across many parts of the UK, including Basingstoke and Deane. The council has significant concerns about whether such a high level of growth can ever be sustainably accommodated. At this stage, we are reviewing the draft Regulation 18 version of the Plan in light of the outcomes of the consultation but also the implications of the proposed new NPPF and are considering next steps.

It is also worth highlighting that the current high housing number generated by the Standard Method for the borough, coupled with a shortage of deliverable sites, has led to the council being unable to demonstrate a full five year housing land supply for a number of years. Whilst the council is taking proactive steps to address this, the position remains at 4.2 years. Setting aside the outcome of the new formula and Local Housing Need figure published alongside the draft NPPF, this further demonstrates the difficulty of meeting our own high housing number and therefore the inability to accommodate further additional homes from neighbouring areas.

As always, we welcome the ongoing dialogue between our Councils and are happy to be assist in the production of relevant statements of common ground if that would be helpful.

Kind regards

Jo

**Joanne Brombley**  
**Planning Policy Manager**  
**Basingstoke and Deane Borough Council**  
01256 845410  
[Joanne.Brombley@basingstoke.gov.uk](mailto:Joanne.Brombley@basingstoke.gov.uk)

Dear Mark,

**Duty to co-operate request regarding Reading Borough's housing needs**

I refer to your letter dated 23 August 2024.

Thank you for indicating that you are intending to plan for 825 homes per year compared with a need for 735 homes per year (based on your 2023 ORS assessment of housing need as opposed to the current standard methodology and the urban uplift) in the Regulation 19 version of the Partial Update of the Reading Borough Local Plan. It is noted that there should not therefore be any unmet needs arising from Reading Borough that neighbouring authorities will need to accommodate.

It is agreed that Reading Borough Council's approach to housing provision (which is supported by Bracknell Forest Council) is likely to come under significant scrutiny at examination, due to the requirement to demonstrate exceptional circumstances for an alternative approach. It is noted that using the current standard methodology would result in a figure of 878 dwellings per year. Over the plan period (2023-2041) this would result in an outstanding need of 954 dwellings (53 dpa). However, this position has not yet been imposed upon you and it is considered premature to be agreeing need matters on this basis.

As you will be aware, Bracknell Forest Council adopted the Bracknell Forest Local Plan (BFLP) in March 2024. This identifies sufficient sites to meet the needs of Bracknell Forest over the period 2020/21-2036/37 with a small amount of flexibility. Due to the deletion of a number of sites by the Inspectors through Main Modifications, the degree of flexibility incorporated into the adopted version of the BFLP is less than originally planned. Furthermore, issues associated with viability are now having an impact on some of our sites which means that in the short to medium term, we are having to draw upon that flexibility. As a result, we are unlikely to be in a position to accommodate any potential unmet need.

As far as the implications of the increase in local housing need suggested through changes to the formula used in the standard methodology are concerned, it is considered too early to make any comments as much depends on the outcome of the current consultation. If the Government was to confirm the use of the suggested formula, this would have significant implications for Berkshire as a whole and further discussions would need to take place on a sub-regional basis.

If you have any queries, please do not hesitate to contact the Development Plans team by emailing [development.plan@bracknell-forest.gov.uk](mailto:development.plan@bracknell-forest.gov.uk).

Yours sincerely

Jo Male

Assistant Director: Planning

Dear Mark Worringham,

**Buckinghamshire Council response – Duty to co-operate request regarding housing needs**

Thank you for your letter of 23 August 2024 within which you asked whether Buckinghamshire Council would be in a position to accommodate any of Reading Borough Council's unmet housing need over some or all of the plan period, and if so, how much and when.

Buckinghamshire Council is pleased to note that Reading Borough Council is intending that its Partial Update to the Local Plan will meet its housing needs in full, and that it does not intend that there will be unmet needs that neighbouring authorities need to accommodate. We further note that the purpose of your letter is to understand the risk if Reading Borough Council's housing need were to be based on the (current) standard method, and that if this occurred Reading would be likely to have a shortfall in supply of some 53 dwellings a year.

Buckinghamshire Council is still at an early stage in the preparation of a Local Plan for Buckinghamshire. We have previously consulted on an attitudes survey and on a draft vision and objectives using the responses received to inform work on the Local Plan. We have not yet reached the stage of fully understanding the capacity of appropriate suitable sites to meet Buckinghamshire's housing needs.

There is further uncertainty related to the government's ongoing consultation on proposed changes to the NPPF, and specifically the proposals relating to the standard method for calculating housing need. For Buckinghamshire, the proposed changes produce a 41.5% uplift from the current standard method calculations, resulting in a housing need of 4,122 dwellings per year (up from 2,912 dwellings per year using the current standard method).

So, to respond to your specific question as to whether we would be in a position to accommodate any of this potential unmet need over some or all of the plan period, and if so, how much and when – because of the early stage of preparation of the Local Plan and further uncertainty around changes to national policy, Buckinghamshire Council is unable to determine if we have a sufficient supply of sites to meet our own need let alone assist with meeting an unmet need from Reading Borough Council.

Other Matters

Buckinghamshire Council notes that Buckinghamshire itself is not adjacent to Reading Borough Council, nor is there a particularly strong relationship in housing market area or travel to work terms between Buckinghamshire and Reading. Data from the 2011 census shows that of the four legacy district areas that now make up Buckinghamshire, only Wycombe sat within the top ten commuting flows to and from Reading. This was at position ten and of the 42,309 commuters coming into Reading from other areas, only 651 were coming from Wycombe. The 2021 census was undertaken during abnormal conditions with Covid-19 impacting on commuting patterns, nevertheless of the 20,844 commuters coming into Reading from other areas, only 429 were coming from Buckinghamshire as a whole.

Given the fact that (1) Buckinghamshire is not adjacent to Reading and the NPPF requires plans to consider the unmet needs of neighbouring areas; and (2) the weak relationship between Reading and Buckinghamshire, we would question the appropriateness of Buckinghamshire assisting with unmet housing needs from Reading.

If you have any questions on this response, please contact me: Stephen Miles, Senior Policy Planning Officer, at [Stephen.Miles@buckinghamshire.gov.uk](mailto:Stephen.Miles@buckinghamshire.gov.uk) or 01494 475885.

Yours sincerely

*Stephen Miles*

Stephen Miles

Senior Planning Policy Officer

Planning, Growth and Sustainability

Buckinghamshire Council

Dear Mark,

**Duty to co-operate request regarding housing needs**

Thank you for your letter dated 23<sup>rd</sup> August 2024.

We note that your recent Housing Needs Assessment concluded that Reading's housing need is 735 homes per year, below the 878 homes p.a. based on the current standard methodology, and that you consider there are exceptional circumstances to justify this. I further note that your Regulation 19 Partial Update plans to provide for 825 homes p.a. compared to the assessed need for 735 homes p.a. Therefore, we welcome your comment that the Partial Update will meet the housing needs assessed on this basis in full.

You go on, however, to state that if the current standard methodology were to be used, the figure arising for Reading would be 878 dwellings per year and this would mean an unmet need of 53 dwellings p.a. (954 dwellings in total).

As you will know, RBWM adopted its Borough Local Plan in 2022, based on an objectively assessed need of 712 dwellings per annum (for the period 2013-33). We were able to meet this need in full, but we had to release Green Belt land in order to do so. Using the current standard method, our need figure would increase to 866 dpa and under the proposed revised standard method set out in the draft NPPF, it would increase significantly further to 1,341 dpa. Meeting this in full would be extremely challenging. **Consequently, the Royal Borough can confirm that in the event that the standard method is used, it would not be able to meet any of the unmet need for housing arising in Reading Borough Council.**

I look forward to continuing constructive discussions with Reading BC under the Duty to Cooperate as your Local Plan Partial Update progresses.

This response has been approved by the Council's Assistant Director of Planning, Adrien Waite.

Yours faithfully,

*I.D.Motuel*

Ian Motuel  
Planning Policy Manager  
Royal Borough of Windsor and Maidenhead

## South Oxfordshire and Vale of White Horse District Councils

Dear Mr Worringham

### **RE: DUTY TO CO-OPERATE REQUEST REGARDING HOUSING NEEDS**

Thank you for your letter of 23 August regarding potential unmet housing needs of Reading and the ability of your neighbouring authorities to accommodate unmet needs.

Our officers have engaged with your colleagues and consultants to understand your local housing need assessment and the emerging partial review of the Reading Local Plan. We therefore understand that Reading Borough Council is writing to its neighbours to clarify to what extent any alternative options for meeting housing need may exist.

South and Vale already engage with Oxford City to help meet their agreed unmet housing need. Our position on meeting any unmet need is that we will not make provision in our emerging Joint Local Plan to meet unmet needs until that need is fully justified, and it is considered necessary within South and Vale, which should be explored through a joint exploration of alternatives.

As you will be aware, we have not engaged with you previously on unmet housing needs specifically. The Reading emerging plan has not advocated meeting unmet need in South and Vale, and we have therefore not taken any steps in the production or evidence gathering of our emerging Joint Local Plan, soon to be considered at the 18 September (Vale) and 19 September (South) Special Council meetings for progressing to the Regulation 19 publication and submission stages.

We would also observe that both South and Vale's current adopted plan spatial strategies and the emerging spatial strategy in the Joint Local Plan do not envisage significant growth near to Reading. This is because the area near to Reading has a number of physical, infrastructure and landscapes constraints in particular.

We will engage with your forthcoming Regulation 19 publication Local Plan in due course, and we will confirm our stance to unmet need in any formal duty to cooperate statements or statements of common ground if required.

Yours sincerely

Emma Baker  
Planning Policy Team Leader

Dear Mr Worringham,

**Duty to Co-operate request regarding housing needs - Reading Borough Council Local Plan Partial Update**

Thank you for your letter dated 23<sup>rd</sup> August 2024 setting out a Duty to Co-operate request from Reading Borough Council regarding housing needs.

West Berkshire District Council (WBDC) welcomes engagement under the Duty to Co-operate (DtC) and acknowledges Reading Borough Council's position with regards to housing needs over the plan period 2023 – 2041.

WBDC notes that the recent housing trajectory published within the Reading Borough Council Annual Monitoring Report demonstrates that the Council is able to meet all of its identified housing need, (699 dwellings per annum) as set out in Policy H1 of the existing Local Plan, within its own boundaries.

WBDC also notes that Reading Borough Council's position is that its Partial Update to the Local Plan will meet its housing needs in full as identified through an alternative approach to calculating housing need rather than the Local Housing Need (LHN) identified under the standard methodology. It welcomes the intention that under this approach the Regulation 19 version of the Partial Update due for consultation later this year will plan for the provision of 825 dwellings per annum compared to the identified need of 735 dwellings per annum, and therefore it is not intended that there will be any unmet needs to be accommodated in neighbouring authorities.

However, WBDC acknowledges that the approach proposed to be taken will come under scrutiny and under the current standard methodology the identified housing need for the Borough over the plan period 2023 – 2041 would be higher, a figure of 878 dwellings per annum which includes a 35% urban uplift. Under the current NPPF consultation this figure would increase further to 1,023 dwellings per annum under the proposed new standard methodology should the published proposals be taken forward in the future. In the event that the current standard methodology was to be used to identify housing need within Reading Borough, WBDC acknowledges there would be a shortfall in provision.

As you are aware WBDC is currently at examination with its Local Plan Review (LPR), and further hearing sessions are scheduled for early October 2024. A Post Hearing Letter was published by the Inspector on 31 July 2024 (IN30) setting out some interim findings and further action points for WBDC. In his letter the Inspector identified that there could be a shortfall in housing provision over the plan period of around 850 dwellings. As such the Inspector requested WBDC consider how the LPR could be modified to boost the housing land supply in light of the possible shortfall identified.

WBDC has identified additional provision, but some of this provision is subject to further work to inform allocations later in the plan period and through an early review of the Plan. West Berkshire's housing land supply will be subject to further discussion at the hearing sessions in early October. Given the current circumstances WBDC is not in a position to assist Reading with any unmet need that might arise within Reading Borough over the plan period to 2041.

WBDC is committed to an early review of the Local Plan and can, if necessary, consider this request again as part of this work. We will continue to work closely with Reading Borough Council and other neighbouring authorities in considering strategic planning issues in the area.

Yours sincerely,

*Laura Callan*

Laura Callan  
Service Lead – Planning



Dear Mark,

**SUBJECT: Duty to cooperate request regarding housing need**

Firstly, I apologise once again for the slowness of formally responding to your request and thank you for your understanding that our resources have had to be directed towards the publication of our Proposed Submission Plan.

Turning now to the detail of your request, you have written regarding Reading Borough Council's (RBC's) decision to undertake a partial update to the adopted Reading Local Plan. Your letter invites comment on the matter of housing need, specifically the potential for unmet housing need which might in your view arise in specific circumstances.

It is important to acknowledge at the outset that whilst badged as a duty to cooperate request, the outlined position is that RBC will be progressing their partial update on the basis of meeting housing need in full and that it is not intended for there to be any unmet need. Nevertheless, RBC wish to understand opportunity should this situation change.

Adopted Reading Local Plan

The adopted Reading Local Plan identified an unmet housing need of 230 dwellings over the plan period to 2036. Housing delivery has however proved to be stronger than anticipated at the time of the plan's preparation and housing need is now projected to be met in full within Reading Borough. This is consistent with information you shared with me in meetings relating to the preparation of the Wokingham Borough Local Plan Update.

For completeness, and as we have also discussed, housing delivery in Wokingham Borough has also been strong, with completions exceeding our housing need as calculated in the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) and all other assessments of need. At 31 March 2023, completions since 2013 exceeded comparative need in the SHMA by 1,833 dwellings.

Current standard method

As you state, the standard method for calculating housing need as set out in the national planning practice guidance calculates the housing need for Reading Borough as 878 dwellings per year. Looking at the detail of the standard method, it is notable that the base formula calculates housing need to be 650 dwellings, with the additional step of the urban uplift, which Reading Borough is subjected to, adding a further 228 dwellings.

Your letter outlines that housing capacity within Reading Borough is estimated to equate to 825 dwellings a year. Should RBC be required to use the standard method figure of 878 dwellings per year, an unmet need of 954 dwellings would arise over the proposed local plan period 2023 to 2041.

It is important in our response to acknowledge advice contained within the National Planning Policy Framework regarding the standard method and the urban uplift. Paragraph 62 states:

*"The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework."*

Footnote 27 expands stating:

*"In doing so, strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right places, to prioritise*

*brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.”*

Our reading of the above is that where a local authority is unable to meet housing need as calculated by the base formula, cooperation is expected to enable this need to be met. There is however no requirement or expectation on RBC to seek to export the proportion of housing need required by the urban uplift step.

From the information provided, RBC is able to meet the housing need as calculated by the base formula (650 dwellings per year). There is therefore no unmet housing need which national planning policy expects to be exported.

Notwithstanding this however, and for the avoidance of doubt, housing delivery in Wokingham Borough is highly dependent on developing greenfield land. Exporting any proportion of housing need required by the urban uplift to Wokingham Borough would require further significant greenfield land to be utilised. This would be in clear conflict with the intended purpose of the urban uplift and national planning policy and our view be inappropriate.

For completeness, our Proposed Submission Plan is based on meeting the housing need for Wokingham Borough as defined by the current standard method. The enabled land supply is capable to address non-implementation, but is not sufficient for the housing requirement to be increased to formally accommodate unmet housing need from other local authorities.

#### Proposed reforms to the NPPF and other changes to the planning system

You have not requested comment on the recent consultation on proposed changes to the National Planning Policy Framework and have simply stated that RBC would need to consider its approach at the appropriate time.

Whilst not requested, it is worth reflecting on the scale of potential challenge. As you state, under the proposed changes, housing need for RBC would rise to 1,023 dwellings per year. Wokingham Borough's need would rise from 748 to 1,308 dwellings per year. Increases would also occur for West Berkshire District Council, Bracknell Forest Council, as well other surrounding local authorities.

Based on our current understanding of housing land supply within Wokingham, the scale of need would exceed capacity. This includes the potential capacity should all strategic development sites be deemed developable, including a site within the designated Green Belt. If the land supply position remains similar going forward, WBC is likely to have unmet housing needs, possibly at a similar or greater scale than RBC. I expect other local authorities will also have a mismatch of housing land supply and need.

We would support senior engagement between the Berkshire local authorities and suggest a report is taken to the Berkshire Prosperity Board to provide context and ask how we might best work together and also with neighbouring local authorities. This might include joint working on a technical evidence base, as well as engagement on a cross authority spatial strategy.

I hope the above is of assistance. Should you require anything further or wish to discuss any aspect, please do not hesitate to contact me.

Yours sincerely,

*Ian Bellinger*

Ian Bellinger  
Head of Planning Policy

## **Appendix 5: Statement of Common Ground with South Oxfordshire and Vale of White Horse District Councils**

## **Statement of Common Ground**

**between**

**South Oxfordshire and Vale of White Horse District Councils**

**and**

**Reading Borough Council**

**In relation to the South Oxfordshire and Vale of White Horse Joint Local Plan  
and the Reading Borough Local Plan Partial Update 2023-2041**

**December 2024**



## **1. Introduction**

1.1 This Statement of Common Ground has been prepared by South Oxfordshire District Council and Vale of White Horse District Council (“South and Vale”) and Reading Borough Council (“Reading BC”) hereafter referred to as “the parties”. It sets out matters that are agreed between the parties in relation to the preparation of the following emerging plans:

- Joint Local Plan, Pre-submission publication version (Regulation 19), South Oxfordshire and Vale of White Horse District Councils, October 2024
- Reading Borough Local Plan Update 2023 - 2041, Pre-Submission Draft.

## **2. Strategic Geography and Plan Making History**

2.1 South Oxfordshire and Vale of White Horse districts cover the most southern parts of the county of Oxfordshire. Covering a combined total area of 125,712 hectares, South and Vale incorporates the towns of Henley on Thames, Wallingford, Didcot, Thame, Abingdon, Faringdon and Wantage.

2.2 Reading Borough adjoins South Oxfordshire to the South of the District. It covers 4,030 hectares and consists of the core part of the urban area of Reading. Reading also shares boundaries with the local authority areas of Wokingham and West Berkshire.

2.3 The boundary between the authorities does not follow precise physical features but lies to the north of the town of Reading, in close proximity to the residential areas of Emmer Green, and Caversham. It broadly follows the edge of the Reading urban area.

2.4 The parties have both reached the Regulation 19 stage of their respective plan making processes.

## **3. Local Plan Positions**

### *Reading BC*

3.1 The Reading Borough Local Plan was adopted in November 2019. A review of the Local Plan was carried out in March 2023 which concluded that there is a need to undertake a Partial Update. A Consultation on Scope and Content (under Regulation 18) was carried out between November 2023 and January 2024.

3.2 Reading BC invited representations on the Pre-Submission Draft Local Plan Partial Update between 6<sup>th</sup> November 2024 and 18<sup>th</sup> December 2024. The plan will be submitted to the Secretary of State after full consideration of the representations received, timetabled for the end of February 2025. The plan is intended to be examined against the December 2023 NPPF, as enabled by the 2024 NPPF draft transitional arrangements.

### *South and Vale Joint Local Plan*

3.3 South and Vale commenced the evidence gathering process for its Joint Local Plan in 2021. A document seeking views on the issues that the Local Plan should cover was issued in 2022 and a Regulation 18 Preferred Options consultation was undertaken in early 2024.

3.4 Feedback from the earlier stages of the plan making process and the conclusions of all the completed evidence base documents were used to prepare the Regulation 19 Pre-Submission Publication version, which was published for comment on 1<sup>st</sup> October 2024 until 12<sup>th</sup> November 2024.

3.5 South and Vale have submitted the Regulation 19 Pre-Submission version of the plan after full consideration of all representations received. The plan is intended to be examined against the December 2023 NPPF, as enabled by the 2024 NPPF transitional arrangements.

### *Duty to co-operate*

3.6 The parties agree that the processes for the South and Vale Joint Local Plan and the Reading Borough Local Plan Partial Update have complied with the duty to co-operate insofar as it relates to cross-boundary matters between South and Vale and Reading.

## **4. Key Strategic Matters**

### ***Engagement on strategic cross boundary matters***

4.1 The parties have engaged to discuss relevant strategic cross boundary matters throughout the preparation of their respective plans. This has included engagement on the various evidence base documents which underpin emerging policies.

4.2 The duty to cooperate activities between the parties are recorded in the following documents:

- South Oxfordshire and Vale of White Horse Duty to Cooperate Statement: Joint Local Plan Pre-Submission Publication Version (Regulation 19) (December 2024).
- Reading Borough Local Plan Partial Update - Duty to Cooperate Statement (November 2024, to be updated prior to submission).

4.3 The relevant strategic cross boundary matters between the parties are as follows:

- Housing need and supply (including affordable housing and the provision of sites for Gypsies and Travellers);
- The supply of retail and employment land; and
- The provision of infrastructure, including health, education, utilities, flood risk and strategic sustainable transport links.

## ***Housing need and supply (including affordable housing and the provision of sites for Gypsies and Travellers)***

### ***Reading BC***

4.4 Reading BC has produced a Housing Needs Assessment (2024) to support the Partial Update. Exceptional circumstances have been identified for basing the plan on an alternative approach to the standard method. A Housing Needs Assessment has identified a local housing need of 735 homes per year. This figure is based on an alternative calculation to the Government's standard method. The calculation of the housing need is set out in the Reading Local Housing Needs Assessment: Report of Findings (July 2024) and the exceptional circumstances for departing from the standard method are set out in the Housing Provision Background Paper (November 2024).

4.5 The published Housing and Economic Land Availability Assessment confirms that the identified need will be met in full and that Reading BC will deliver 825 homes per year over that period.

4.6 The local housing need figure for Reading BC calculated using the Government's standard method is 878 homes per annum. As set out above, the Partial Update is based on an alternative calculation due to exceptional circumstances, but on 23<sup>rd</sup> August 2023, Reading BC wrote to all local planning authorities within 10 km radius of the Borough boundary to scope out the potential to accommodate unmet need if the Partial Update to Local Plan were to be based on the alternative outcome of the standard methodology. This unmet need would amount to 954 homes over the plan period to 2041.

4.7 South and Vale responded to this request by noting that it would be premature to engage on this matter as work on Joint Local Plan has not made any provision for meeting unmet needs from Reading as discussions had been on the basis of Reading meeting its own needs, and that there should be a joint exploration of alternatives before any such provision would be made.

4.8 Reading BC's adopted plan also identifies requirements to meet the need for Gypsy and Traveller Pitches and sites for Travelling Showpeople, and this policy is not amended as part of the Partial Update. Reading BC has gone through a thorough site assessment process, which culminated in a consultation on Gypsy and Traveller provision during September and October 2017. The conclusion was that there were no sites that could meet the permanent or transit accommodation needs.

4.9 Reading BC continues to explore with its neighbours whether there are options for meeting the permanent need outside the Borough. A transit site has been granted planning permission within Reading that would meet the identified transit needs, and transit needs would not be expected to be met outside Reading in any case.

4.10 In terms of travelling showpeople, the small need identified is unlikely to be able to support a new site on its own and therefore any proposal for expansion of the existing site will need to be considered on its merits.

### *South and Vale*

4.11 The Joint Local Plan identifies a housing requirement of 31,020 units (16,530 for South Oxfordshire and 14,490 for Vale of White Horse). South and Vale is proposing to bring forward a supply of 39,757 homes over the plan period 2021-2041 (19,978 in South Oxfordshire and 19,779 in Vale of White Horse).

4.12 The proposed supply will exceed the identified housing requirement over the plan period. In addition to meeting its own needs, South and Vale are proposing to meet a proportion of the total unmet housing need identified in the adopted Local Plan for Oxford City. The plan continues to make provision for this, with an additional 4,950 homes for South Oxfordshire, and 1,830 homes for Vale of White Horse.

4.13 The spatial strategy contained within Policy SP1 proposes to meet a large proportion of the housing requirement through the provision of new garden communities at Didcot, Berinsfield and Dalton Barracks and a focus for growth at 'Science Vale'. New development will be supported on well-located brownfield sites in sustainable locations. The spatial strategy does not propose the release of Green Belt land to meet development needs.

### *Summary*

4.14 Policies in the parties' respective emerging Local Plans reflect the conclusions of the relevant latest calculation of housing need and both Plans propose to fully meet this need. There is no expectation of unmet need needing to be planned for by neighbouring local authorities.

4.15 Policies in the parties respective emerging local plans reflect the conclusions of the latest assessment for Gypsy and Traveller pitch provision. There is no expectation of unmet need needing to be planned for by South and Vale to neighbouring local authorities. There is an existing unmet need for permanent pitches arising from Reading that is unaltered by the Partial Update which Reading BC continues to seek to work with all neighbouring authorities on to identify opportunities.

### ***The supply of retail and employment land***

#### *Reading BC*

4.16 Reading BC identifies the need for additional office and industrial floorspace over the plan period in policy EM1 of its emerging local plan. The capacity identified through the HELAA and other evidence indicates that these needs can be met and Reading BC is not seeking to accommodate any unmet employment need in neighbouring authorities nor has it any space capacity to meet the unmet need of its neighbours. Policies relating to retail floorspace reflect the conclusions of the latest



relevant evidence and no significant need arises that would need to be met inside or outside Reading Borough.

#### *South and Vale*

4.17 South Oxfordshire has a need for 25.8 hectares of employment land to meet employment needs over the plan period, and Vale of White Horse has a need for 113.2 hectares. This will be met through various supply sources and site allocations. The emerging plan identifies a supply 35.34 hectares in South Oxfordshire and 277.88 hectares in Vale of White Horse to meet employment needs. Policies relating to retail floorspace reflect the conclusions of the latest relevant evidence. South and Vale are not seeking to accommodate any unmet employment need in neighbouring authorities.

#### ***The provision of infrastructure, including health, education, utilities, flood risk and strategic sustainable transport links***

#### *Reading BC*

4.18 Section 10.3 of the emerging Reading Local Plan and the associated Table 10.2 provide a summary of the Council's Infrastructure Delivery Plan and the items that are required to support planned growth. Table 10.2 identifies the Third Thames Crossing, as an alternative north-south route across the River Thames via a new road, public transport and active travel bridge and associated mitigation measures on the road network. Table 10.2 also identifies a series of Park and Ride Mobility Hubs, which as set out in relation to the transport policies would likely require land outside Reading, and corridors where these hubs would be proposed include three routes crossing the boundary with South Oxfordshire, although no sites are identified.

#### *South and Vale*

4.19 South and Vale's Local Plan does not refer to the Third Thames Crossing and land is not safeguarded to accommodate the crossing. At this stage, South and Vale consider the proposal is not deliverable. Oxfordshire County Councils' approach to Mobility Hubs does not appear to align with Reading BCs approach to Park and Ride Mobility Hubs, further work is needed to understand how these hubs could reduce car dependency and effective use of land thus land is not safeguarded for these schemes in the JLP. 4.20 South and Vale and Reading BC have prepared Infrastructure Delivery Plans (IDPs) to identify infrastructure needs arising from planned growth. These important documents reflect all aspects of infrastructure need relating to those plans. The parties do not expect growth identified in their respective local plans to generate additional needs for community infrastructure (school places and healthcare facilities) in adjoining authorities.

## **5. Areas of Agreement**

5.1 The parties have engaged effectively and on an on-going basis during the plan making process. The respective local plans propose to make provision to fully meet the evidenced identified development needs unless otherwise stated in this Statement.

5.2 The parties agree that the evidence supporting the respective plans is robust and proportionate.

5.3 Policies in the respective plans reflect the climate emergency declared by South Oxfordshire, Vale of White Horse and Reading BC.

5.4 There may be opportunities for green infrastructure, walking/cycling linkages/, including those identified in green infrastructure evidence and active travel strategies. Further advancing of such opportunities responds to the issue of tackling the climate emergency.

5.5 Necessary engagement in relation to the respective plans will continue for some 'live' aspects of the evidence, such as GTAA and Infrastructure Delivery Plans.


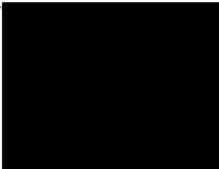
## **6. Governance Arrangements Including Future Review**

6.1 The parties agree to:

- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies;
- To review and update this Statement of Common Ground in the light of any material change in circumstances; and
- To maintain positive principles of cooperation.

## **7. Signatories**

7.1 We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between South and Vale and Reading BC. The parties will continue to work together to address cross boundary issues.

<b>On behalf of Reading Borough Council</b>	<b>On behalf of South Oxfordshire and Vale of White Horse Councils</b>
James Crosbie	Tim Oruye
Assistant Director for Planning, Transport and Public Protection	Head of Policy and Programmes
	
<b>Date</b>	
<b>09 December 2024</b>	<b>09 December 2024</b>

## **Appendix 6: Statement of Common Ground with Wokingham Borough Council**

# **STATEMENT OF COMMON GROUND BETWEEN READING BOROUGH COUNCIL AND WOKINGHAM BOROUGH COUNCIL**

**Regarding the Reading Borough Local Plan  
Partial Update**

**May 2025**

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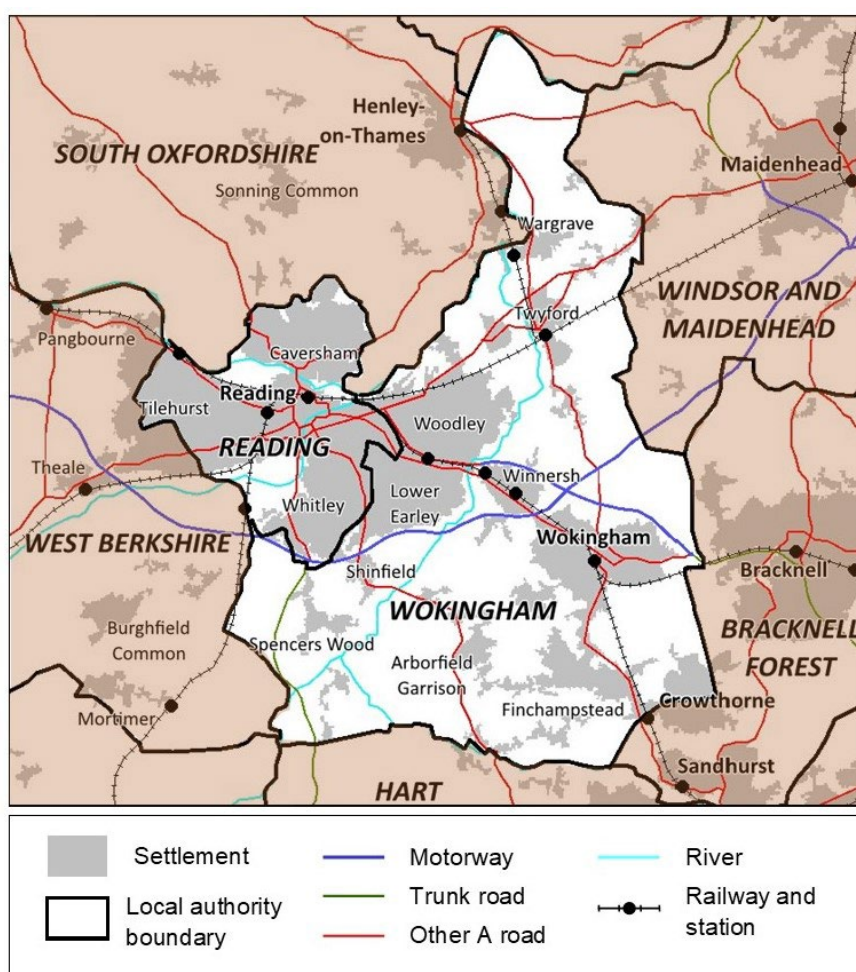
## **1. Introduction**

- 1.1 This Statement of Common Ground has been prepared by Wokingham Borough Council (WBC) and Reading Borough Council (RBC), collectively referred to as “the parties”. It sets out matters that are agreed between the parties in relation to the preparation of the Reading Borough Local Plan Partial Update (LPPU) at submission stage.

## **2. Strategic geography**

- 2.1 RBC and WBC cover two adjacent unitary authorities in the county of Berkshire. The boundary extends from the meeting place of the Kennet and Thames rivers in the north east to the Green Park area in the south west, and has a total length of approximately 12 km. The area lies around 50-60 km west of London, with the River Thames, M4 motorway and Great Western main line passing through both boroughs.
- 2.2 Reading Borough covers the town and core urban area of Reading. It has a total area of 4,041 ha. It is generally urban in nature, with undeveloped parts of the Borough being mainly public open spaces and flood meadows.
- 2.3 Wokingham Borough covers an area of 17,892 ha and is characterised by a variety of settlements with the largest being Earley, Winnersh and Woodley, which are in proximity to Reading Borough, and Wokingham.

**Figure 1: Geography of the area**



- 2.4 The boundary between RBC and WBC passes mainly through the wider Reading urban area, with the towns of Woodley and Earley (within Wokingham borough) being part of a contiguous urban area with Reading. The boundary bisects the University of Reading's Whiteknights Campus, the Green Park business park and Junction 11 of the M4.
- 2.5 The parties are linked by various roads, notably the M4, A33, and Reading Road / Wokingham Road (A329). The Reading to London Waterloo, Great Western Railway mainline into London Paddington, and the Reading to Gatwick airport railway lines also connect the boroughs.

### 3. Local plan positions

#### Reading Borough Council

- 3.1 The Reading Borough Local Plan was adopted in November 2019. A review of the Local Plan was carried out in March 2023 which identified a need to undertake a partial update, covering approximately half of the policies within the plan.
- 3.2 A Consultation on Scope and Content (under Regulation 18) was carried out between 27<sup>th</sup> November 2023 and 31<sup>st</sup> January 2024.

- 3.3 A Pre-Submission Draft LPPU was subject to consultation under Regulation 19 between 6<sup>th</sup> November and 18<sup>th</sup> December 2024.
- 3.4 The plan will be submitted for examination under the transitional arrangements set out in the 2024 version of the National Planning Policy Framework (NPPF), meaning it will be examined against the requirements of the December 2023 NPPF.
- 3.5 The WBC response to the Pre-Submission version of the LPPU is included as Appendix 1.

### **Wokingham Borough Council**

- 3.6 WBC commenced evidence gathering to inform the Local Plan Update in 2016. The plan-making process has been informed by opinions expressed through various consultations, including Issues and Options Consultation (2016), Homes for the Future Consultation (2018), Draft Plan Consultation (2020) and Revised Growth Strategy Consultation (2021). A wide range of technical reports have also been completed, including reports relating to sustainability, landscape character, transport, flood risk, air quality, housing, economic and retail needs, and land supply.
- 3.7 WBC invited representations on the Local Plan Update Proposed Submission Plan between 30<sup>th</sup> September and 13<sup>th</sup> November 2024. It was submitted to the Secretary of State on 28<sup>th</sup> February 2025.
- 3.8 The plan was submitted for examination under the transitional arrangements set out in the 2024 version of the National Planning Policy Framework (NPPF), meaning it will be examined against the requirements of the December 2023 NPPF.

### **Minerals and Waste Local Plan**

- 3.9 WBC and RBC worked jointly in the preparation of the Central and Eastern Berkshire Joint Minerals and Waste Plan with Bracknell Forest Council and the Royal Borough of Windsor and Maidenhead. The plan was adopted in January 2023. There is no published timetable for its review.

## **4. Strategic matters**

- 4.1 The parties have engaged to discuss relevant strategic cross boundary matters throughout the preparation of their respective plans. This has included engagement on the various evidence base documents which underpin emerging policies.
- 4.2 The duty to cooperate activities between the parties in relation to the LPPU are recorded in the RBC Duty to Cooperate Statement (April 2025).
- 4.3 A separate Statement of Common Ground (March 2025) has been prepared between the parties relating to WBC's Local Plan Update process.
- 4.4 The following are identified as strategic matters in RBC's Duty to Co-operate Statement (2024) upon which co-operation with WBC is required.
  - a) Housing needs and provision
  - b) Needs and provision for gypsies and travellers
  - c) Needs and provision for economic development and town centres



- d) Strategic transport infrastructure needs and provision
- e) Strategic education infrastructure needs and provision
- f) Strategic healthcare infrastructure needs and provision
- g) Strategic landscape considerations
- h) Strategic biodiversity considerations
- i) Strategic flooding considerations
- j) Climate change and mitigation
- k) Open space and recreation provision
- l) Tall buildings and strategic views
- m) Utilities infrastructure needs and provision
- n) University of Reading
- o) Planning within the Detailed Emergency Planning Zone for AWE Burghfield
- p) Planning for minerals
- q) Planning for waste

#### **a) Housing needs and provision**

- 4.5 The Berkshire (Including South Bucks) Strategic Housing Market Assessment (SHMA) identified Wokingham Borough and Reading Borough as being part of a Western Berkshire Housing Market Area (HMA) centred on Reading and comprising the local authorities of Reading Borough Council, Bracknell Forest Council, West Berkshire District Council and Wokingham Borough Council. Whilst HMAs are no longer specifically referenced in the NPPF, the accompanying Planning Practice Guidance: Plan-Making references them in the context of cooperation. The parties agree that for Wokingham Borough and Reading Borough, the Western Berkshire HMA is the core area for cooperation on the planning of housing.
- 4.6 The adopted Reading Borough Local Plan identified a modest total shortfall of 230 dwellings in total, to be delivered within the Western Berkshire HMA. A Memorandum of Understanding across the four Western Berkshire HMA authorities agreed that this unmet need would be delivered in the HMA, without specifying an authority or location. Both parties agree that this position is now out-of-date as housing needs have changed, and RBC is now able to deliver this shortfall in full within its own boundaries over the plan period to 2036. There is no unmet need arising from other local authorities within the Western Berkshire Housing Market Area.
- 4.7 The level of housing need in the LPPU is based upon the Reading Housing Needs Assessment (HNA). This identified a need for 735 homes per year up to 2041. WBC was involved as a stakeholder in the production of the HNA and considers the methodology to be robust. Both parties agree that the operation of the standard method in the NPPF would result in a higher level of housing need of 878 homes per year (at the time of publication of the LPPU Regulation 19). RBC believe that exceptional circumstances exist for use of the HNA figure.
- 4.8 Based on the level of need from the HNA, both parties agree that the LPPU meets its housing needs within Reading's boundaries, seeking to deliver 825 homes per year

and does not result in unmet housing need. WBC's supported of this approach in principle, with full agreement being contingent upon the results of a transport assessment.

- 4.9 WBC note that, for those authorities affected by the urban uplift (including Reading) in the standard method in the December 2023 version of the NPPF there is no requirement or expectation on cooperation from neighbouring authorities to meet the proportion of housing need required by the additional urban uplift stage, and that development in Wokingham Borough is highly reliant on greenfield land would not fulfil the purpose of the urban uplift.
- 4.10 For WBC, the local housing need figure as defined by the standard method set out in national guidance associated with the 2023 NPPF is 748 dwellings per year at 1 April 2024 and 795 dwellings at 1 April 2023. Housing need over the plan period 2023-2040 equates to 12,763 dwellings as set out in Policy SS10. The Proposed Submission Plan enables a land supply capable of providing as a minimum 13,955 dwellings within the plan period, meeting local housing need plus a reasonable allowance for potential non-delivery. No unmet needs arise from Wokingham Borough.
- 4.11 The parties agree that both plans make provision to meet their own housing needs in full with land supply expected to exceed need in both cases over the plan period.
- 4.12 The parties agree to continue necessary engagement regarding infrastructure provision, including that concerning highway impacts.

#### **b) Needs and provision for gypsies and travellers**

- 4.13 A Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment was carried out to support the now-adopted Reading Borough Local Plan. This identified a need for 10-17 permanent pitches for gypsies and travellers. Despite an exhaustive process of searching for sites, the Local Plan was unable to identify land to meet this need. A Duty to Co-operate process was followed with neighbouring authorities to seek to identify land outside Reading Borough to meet this unmet need but no sites were identified and no authority was in a position to plan to meet any of this unmet need.
- 4.14 No additional sites have emerged within Reading since the Local Plan was adopted in 2019 that offer potential to meet the unmet need for permanent pitches. No changes from the adopted plan are proposed to policy H13 on provision for gypsies and travellers or to any allocated sites that would provide for gypsies and travellers. An unmet need from Reading Borough therefore remains in exactly the same way as with the adopted plan. RBC continues to explore options with surrounding local authorities for this need to be accommodated outside of Reading Borough.
- 4.15 Given the scale of WBC's own Gypsy and Traveller needs, WBC consider that all opportunities have been taken to address its own needs, including allocating specific sites, delivery as part of strategic sites and a positive framework to support windfall development. At this time there is no capacity within Wokingham Borough to accommodate unmet need from other local authorities. The parties agree to maintain open dialogue on this matter.

### **c) Needs and provision for economic development and town centres**

- 4.16 The needs and provision for economic development and town centres in the LPPU are based on the results of a Commercial Development Needs Assessment (CDNA, 2024).

#### ***Economic development***

- 4.17 In terms of economic development, the Berkshire Functional Economic Market Area (FEMA) study that underpinned the adopted Local Plan identified Wokingham Borough and Reading Borough being part of a Central Berkshire FEMA, centred on Reading and comprising the authorities of Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead, and Wokingham Borough Council. The Royal Borough of Windsor and Maidenhead is also part of the Eastern Berkshire FEMA, alongside Slough Borough Council. The parties agree the continued relevance of this strategic geography.
- 4.18 The needs for economic development are developed from a range of scenarios in the CDNA, but the need figures on which the LPPU are based on the need from the 'blended scenario' minus the safety margin and allowance for future losses, and are as follows:
- 85,803 sq m of office floorspace; and
  - 167,113 sq m of industrial, warehouse and research and development floorspace.
- 4.19 Policy EM1 provides to meet up to this level of need, with the provision for office development expressed as a range between assessed specific capacity and the identified need. As such, the policy provides to meet full economic development needs for Reading within Reading Borough.
- 4.20 The need for employment land within Wokingham Borough has been identified through an Employment Land Needs Assessment (2024). Employment needs over the plan period is set out in Table 3 of the Proposed Submission Plan and reproduced below.

***Table 1: Wokingham employment needs 2022-2040***

	<b>Industrial</b>	<b>Office</b>
Identified need 2022-2040	73,756 m <sup>2</sup> (18 Ha)	30,761 m <sup>2</sup> (GIA)
Completions 2022-2023	41,284 m <sup>2</sup>	4,979 m <sup>2</sup>
Commitments at 31 March 2023	7,731 m <sup>2</sup>	41,313 m <sup>2</sup>
Net need (2023-2040)	24,741 m <sup>2</sup>	15,531 m <sup>2</sup> over supply

- 4.21 Future office needs are anticipated to be met, because there is an oversupply of over 15,000 sq m floorspace when compared to identified needs.
- 4.22 Future industrial need can be met through a combination of completions, commitments and the expansion of Core Employment Areas as set out in Policy SS8.

- 4.23 Employment needs can be delivered in full within Wokingham Borough over the plan period.
- 4.24 The parties therefore agree that there is no unmet employment or economic development need arising from either authority.

#### *Town centres*

- 4.25 The CDNA for Reading found an overprovision of 5,467 sq m of comparison goods floorspace up to 2041 and a very small positive need of 428 sq m of convenience goods. This small positive need can be accommodated by reallocation of existing retail space between comparison and convenience. As such no positive need for new development arises and Policy RL2 plans only for sufficient provision to maintain the vitality and viability of the network and hierarchy of centres. There is no unmet need to be accommodated elsewhere.
- 4.26 The need for retail land in Wokingham has been identified through a Retail and Commercial Leisure Study (2023). A modest need for between 14,700 sq m and 17,200 sq m of convenience goods by 2040 was identified, which can be delivered over the plan period, and WBC is not seeking to accommodate any unmet need in neighbouring local authorities.
- 4.27 The parties agree that the scale of retail and town centre development planned for does not give rise to particular cross-boundary impacts.

### **d) Strategic transport infrastructure needs and provision**

#### *Transport assessment*

- 4.28 The Transport Assessment offers a high-level overview of existing and forecast network conditions. Whilst only a high level assessment, it is generally accepted that emerging allocations will have a small impact on the wider highway/transport network. RBC are developing an Infrastructure Delivery Plan that will help mitigate travel demand changes which will continue to evolve.
- 4.29 At Regulation 19 stage, WBC submitted an objection under the duty to co-operate due to not having had a chance to see RBC's Transport Assessment. This duty to co-operate objection was withdrawn on 2<sup>nd</sup> May 2025 after RBC's Transport Modelling report was provided and reviewed by WBC.

#### *Overall transport strategy*

- 4.30 The overall transport strategy is set out in Policy TR1 of the LPPU. WBC is supportive of the approach in general, but considers that references to sustainable should include ultra-low and zero emission vehicles as identified in the National Planning Policy Framework.

#### *Bus rapid transit*

- 4.31 The emerging Infrastructure Delivery Plan includes a range of mitigation measures including mobility hubs and BRT, that together will help meet the wider travel needs of RBC and neighbouring areas of WBC.

### *Park and ride mobility hubs*

- 4.32 WBC is supportive of the principle of park and ride provision on key corridors, and all three multi-modal corridors that extend into Wokingham Borough on Figure 4.6 of the LPPU are already served by operational park and ride facilities, at MereOak, Winnersh Triangle and Thames Valley Park. All existing park and ride sites serving Reading are located in Wokingham Borough.
- 4.33 WBC considers that more work is required to preserve the long-term viability of these transport interchanges, particularly as the proposed development allocations will redevelop land uses that might mode shift in WBC, utilising Park & Ride services. Similarly, the potential introduction of mobility hubs as an alternative to Park & Ride should be clearly defined both in terms of facility and location either within RBC or WBC.

### *Crossing the Thames*

- 4.34 WBC supports paragraph 8.2.1 which states RBC will continue to work with other local authorities towards the provision of a crossing of the River Thames, east of Reading. The parties agree that any crossing would require mitigation on the local road network, and agree to continue to work together on provision of cross Thames measures and any necessary additional measures.

### **e) Strategic education infrastructure needs and provision**

- 4.35 The level of growth proposed in the LPPU results in needs for new education provision, which is outlined in the Infrastructure Delivery Plan. WBC's response (Appendix 1) identifies the potential for an increase in local school population meaning that Wokingham Borough families may be unable to secure a local school place.
- 4.36 RBC's Infrastructure Delivery Plan does not envisage a lack of places for primary and secondary education within RBC over the plan period. The additional needs are related to special educational needs, early years and some specialist provision, and places to fulfil these needs should be delivered within Reading without reliance on adjoining areas. The parties agree that on this basis there should not be any additional cross-boundary implications.

### **f) Strategic healthcare infrastructure needs and provision**

- 4.37 The level of growth proposed in the LPPU results in needs for new healthcare provision, which is outlined in the Infrastructure Delivery Plan, and sites in the Partial Update are identified where possible. The parties agree that this will not result in additional cross-boundary implications.
- 4.38 The Royal Berkshire Hospital (RBH) is currently located in Reading but serves a much wider area, including much of Wokingham Borough. At the time of submission, there is a proposal to redevelop the RBH either on- or off-site as part of the New Hospitals Programme, expected to be towards the end of the plan period. Other sites under consideration include sites in Wokingham Borough. No decisions on sites have been made. The parties have co-operated with one another and with Royal Berkshire

Hospital Foundation Trust in understanding cross-boundary implications and will continue to do so throughout the process.

#### **g) Strategic landscape considerations**

- 4.39 The Thames Valley is the primary cross-boundary landscape of significance. Growth within the vicinity of the Thames in the LPPU takes place on previously developed land, and the parties agree that there will be no cross-boundary concerns relating to strategic landscape.

#### **h) Strategic biodiversity considerations**

- 4.40 This issue has been identified as habitats cross boundaries, and the fragmented nature of habitats within the urban area of Reading means a particular emphasis on links between habitats and towards undeveloped areas often in adjoining authorities. There are no strategic habitats that cross the boundary between Reading and Wokingham Borough and the parties do not expect the growth identified in the LPPU to have cross-boundary implications in terms of biodiversity.

#### **i) Strategic flooding considerations**

- 4.41 A Strategic Flood Risk Assessment (Level 1) has been prepared to identify the level of flood risk in Reading. The parties do not expect the growth identified in the LPPU to have cross-boundary implications in terms of flood risk.

#### **j) Climate change and mitigation**

- 4.42 The parties have both declared a Climate Emergency – RBC in February 2019 and WBC in July 2019. At the time of declaration, RBC stated its aim for a carbon neutral Reading by 2030. The LPPU contains policies to ensure that development plays its part in achieving this aim, and the parties agree that this approach is sound.

#### **k) Open space and recreation provision**

- 4.43 This issue is identified due to the potential for existing or new areas of open space to cross boundaries. The LPPU does not propose any changes that would affect cross-boundary open space.

#### **l) Tall buildings and strategic views**

- 4.44 This issue is identified due to tall buildings in Reading town centre being, or becoming, visible from within Wokingham Borough. The parties agree that no change is proposed in the LPPU that would be likely to result in a greater cross-boundary impact.

#### **m) Utilities infrastructure needs and provision**

- 4.45 The level of growth proposed in the LPPU results in needs for electricity upgrades, which are outlined in the Infrastructure Delivery Plan. The parties agree that this will not result in additional cross-boundary implications.

#### **n) University of Reading**

- 4.46 The boundary between WBC and RBC passes through the Whiteknights Campus, which is the University of Reading's main campus and splits some university

buildings. Approximately two thirds of the campus is within WBC with the remaining third within RBC. The University's secondary campus at London Road is located in RBC as is the majority of the off-campus student accommodation.

- 4.47 The parties recognise the great significance of the University to the wider area, and policies in the parties' plans set out to achieve this. Policy ER2 in RBC's LPPU and SS9 in WBC's Local Plan Update 2023 – 2040 Proposed Submission Plan are dedicated policies relating to the Whiteknights Campus and are consistent with one another. WBC supports RBC's general approach to the Whiteknights Campus.

#### **o) Planning within the Detailed Emergency Planning Zone for AWE Burghfield**

- 4.48 AWE plc operates AWE Burghfield, which is situated within West Berkshire District Council. It is operated on behalf of the Ministry of Defence and is a nuclear licensed site. West Berkshire District Council is the lead local authority for emergency planning for AWE Burghfield and is the owner of the AWE Off-Site Emergency Plan.
- 4.49 A Detailed Emergency Planning Zone (DEPZ) is defined around AWE Burghfield which extends into both Wokingham Borough and Reading Borough.
- 4.50 Policy OU2 states that any proposal for development within the DEPZ that would increase the residential or non-residential population and level of activity will not be acceptable unless it does not prejudice the security and future of AWE B, and any increase in population within the DEPZ can be accommodated in the context of the AWE B Off-Site Emergency Plan.
- 4.51 The LPPU proposes to mainly meet development needs outside of the AWE DEPZ and allocates no new sites within it. Sites within the adopted Local Plan that fall within the DEPZ are retained, specifically:
- SR1a: Former Landfill, Island Road for employment development
  - SR1c: Island Road A33 Frontage for employment development
  - SR4e: Part of former Berkshire Brewery site for employment development
- 4.52 WBC supports the approach towards AWE Burghfield in the LPPU, subject to the addition of reference to other consultation zones identified by the Office for Nuclear Regulation (ONR).

#### **p) Planning for minerals**

- 4.53 All matters are dealt with in the adopted Central and Eastern Berkshire Joint Minerals and Waste Plan.

#### **q) Planning for waste**

- 4.54 All matters are dealt with in the adopted Central and Eastern Berkshire Joint Minerals and Waste Plan.

### **5. Areas of agreement**

- 5.1 The parties have engaged effectively and on an on-going basis during the plan making process and RBC has fully fulfilled its duty to cooperate with WBC.



5.2 The parties agree the following statements of common ground:

- a) The parties agree that the LPPU makes provision to fully meet development needs.
- b) The parties agree there is no unmet need for housing arising from either authority.
- c) The parties agree that there is an unmet need for Gypsy and Traveller accommodation arising from Reading Borough and that an open dialogue on this will continue.
- d) The parties agree that there is no unmet need for employment or town centre development arising from either authority.
- d) The parties agree that the evidence supporting the LPPU is proportionate to the plan-making stage of planning.
- e) The parties agree that the overall strategy promoted by the LPPU is sound.
- f) The parties agree that the proposed development allocations are developable in principle, and that WBC are consulted on the development of the Infrastructure Delivery Plan to ensure an appropriate package is delivered across the RBC/WBC boundary.
- g) The parties will continue engagement relating to plan-making as appropriate and necessary.
- h) The parties will continue to engage through the planning application process on development proposals in vicinity of the administrative boundary, or further afield where there is potential for cross boundary impacts.

## **6. Areas of further work or disagreement**

- 6.1 Further engagement on Reading's unmet needs for Gypsy and Traveller provision will continue.
- 6.2 Engagement will continue between the parties and with Royal Berkshire Hospital Foundation Trust, as well as the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board, on matters relating to the Royal Berkshire Hospital and strategic implications for healthcare.
- 6.3 Further engagement between the parties will continue on major transport projects including Bus Rapid Transit, park and ride mobility hubs and Cross-Thames travel.

## **7. Governance Arrangements Including Future Review**

- 7.1 The parties agree to:
  - Continue to cooperate and work collaboratively regarding the location and timing of infrastructure delivery;
  - Continue to cooperate and work collaboratively to agree the location and timing of highways and transport infrastructure to mitigate the cumulative impact of development;



- Keep a dialogue open on Gypsy and Traveller accommodation provision;
- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies;
- Review and update this Statement of Common Ground in the light of any material change in circumstance; and
- Maintain positive principles of cooperation.

## **8. Signatories**

- 8.1 We confirm that the information in this Statement of Common Ground reflects the joint working and engagement undertaken to date to address identified strategic matters. The parties will continue to work together to address cross boundary issues.

Signed for Reading Borough Council



Name: Matthew Golledge

Position: Acting Assistant Director for Planning, Transport and Public Protection

Date: 8 May 2025

Signed for Wokingham Borough Council



Name: Trevor Saunders

Position: Assistant Director, Planning

Date: 08/05/2025

## **Appendix 1: Wokingham Borough Council response to the Pre-Submission Draft Local Plan Partial Update**

Email: [ian.bellinger@wokingham.gov.uk](mailto:ian.bellinger@wokingham.gov.uk)

Date: 17 December 2024

Your ref: -

File ref: Letter/RBC/LP Partial Update Reg19



**WOKINGHAM  
BOROUGH COUNCIL**

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Planning Policy Manager  
Reading Borough Council

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Via email

Dear Mark,

**SUBJECT: Reading Borough Council Local Plan Partial Update**

This forms the officer's response to the Reading Borough Council's consultation on the Local Plan Partial Update: Pre-Submission Draft (Regulation 19) November 2024 (hereafter referred to as the Plan).

At the outset, I wish to acknowledge the established and ongoing constructive working between Reading Borough Council (RBC) and Wokingham Borough Council (WBC) on strategic planning matters, and the wish of both parties for this to continue.

Unfortunately, in the absence of a transport assessment to show the Plan is effective, WBC has felt it necessary to state that at this time the Duty to Cooperate has not been discharged and the plan is unsound. As we have discussed, WBC wish to work proactively with RBC with a view to being able to confirm the Duty to Cooperate has been met and the broad soundness of the Plan in due course and before the Plan is submitted for examination.

**Spatial strategy and transport**

WBC acknowledges that meeting development needs in the context of Reading Borough will require the redevelopment and intensification of the town's urban area. The Plan

outlines that 59% of new dwellings are anticipated within the Central Reading area, 18% in the South Reading area and 13% elsewhere. WBC does not object to the principle of this approach, however it is necessary for the impacts of the spatial strategy to have been appropriately assessed and suitable mitigations identified. Whilst it is understood that a transport assessment has been commissioned, the assessment does not currently form part of the published evidence base supporting the Plan, nor has any draft output been shared with WBC on a confidential basis.

In the absence of a transport assessment, it is not possible to understand whether the impacts of the spatial strategy proposed by the Plan have been suitably assessed and therefore understood, or the effectiveness of proposed mitigations, both within Reading Borough and potentially beyond, including within Wokingham Borough.

WBC cannot therefore conclude that the impacts on the highway network in Wokingham Borough are acceptable. As a result, WBC must conclude the Plan at this time does not comply with the Duty to Cooperate and is unsound. As outlined above, WBC are aware that a transport assessment is being progressed and wish to work proactively with RBC in reviewing this with a view to being able to confirm compliance with the Duty to Cooperate and broad soundness in due course and before the Plan is submitted for examination.

### **Paragraph 3.1.3**

WBC suggest paragraph 3.1.3 is modified to remove reference to the South of the M4 Strategic Development Location. This is currently referenced as being of particular significance to Reading Borough, however at 1 April 2024, only 138 dwellings had not been completed. At least a further 10 dwellings have been completed in the period since. Given the limited scale of remaining completions and the modest development proposed in the area under the Wokingham Borough Council Local Plan Update Proposed Submission Plan (circa 360 dwellings), WBC do not believe the SDL is of particular cross boundary significance that justifies reference in the Plan. As you will be aware, the SDL allocation is not carried forward in the Wokingham Borough Council Local Plan Update Proposed Submission Plan due to its advanced stage of delivery. It is accepted that the Loddon Valley Garden Village proposal is of significance and should be referenced. Suggested modifications are outlined below.

*“There is no agreed overarching spatial strategy that applies to the local area, but there is a need for development plans in the area to complement one another. This is particularly the case across the main functional area, the West*

*of Berkshire area. Within this area, each authority has an adopted or emerging local plan that is at an advanced stage. Figure 3.1 sets out the overall spatial context for the area, including major areas of development outside Reading's boundaries. Of particular significance for Reading ~~are the strategic development locations (SDLs) in Wokingham due to their proximity to our boundary, including the South of the M4 SDL (much of which has already been completed and is not therefore shown), and is~~ the proposed Loddon Valley Garden Village SDL comprising phased delivery of 3,930 homes that forms part of Wokingham's Proposed Submission Local Plan Update. Developments on this scale will be expected to deliver a significant improvement in infrastructure, ~~and with~~ transport links into Reading in particular by active travel and public transport ~~will be of vital importance."~~*

**Figure 3.1**

WBC do not object to Figure 3.1 but note that whilst the AWE Detailed Emergency Planning Zone is shown, the associated supporting text does not include reference. Given the AWE DEPZ has not been referred to in the Plan up to this point, it is suggested that a brief explanation is added to preceding text to assist the reader.

**Paragraph 3.2.12**

WBC suggest paragraph 3.2.12 is modified to remove reference to the South of the M4 Strategic Development Location for the reasons set out above in response to paragraph 3.1.3.

It is accepted that the Loddon Valley Garden Village proposal is of significance and should be referenced within the paragraph text. Notwithstanding, the text referring to Reading inevitably being the main town the development will rely on for higher order infrastructure is unclear.

Whilst WBC accepts that Reading town centre is a higher order centre for comparison retail, the Loddon Valley Garden Village will include primary schools, a secondary school and a district centre, and is in proximity to key employment destinations within Wokingham Borough. There are also a number of conveniently located supermarkets within Wokingham Borough to support more local food shopping, the likely use of which by residents is support by retail survey information.

Suggested modifications are outlined below.

*“Major developments outside Reading: It is likely that there will be significant development of new homes, together with supporting facilities, on the edge of the Reading urban area. ~~A Strategic Development Location around Shinfield and Spencers Wood has been identified for some time in Wokingham’s development plan, and much of it is already complete.~~ As set out in paragraphs 3.1.3, the Proposed Submission Wokingham Local Plan ~~also~~ identifies major development at Loddon Valley Garden Village. Whilst ~~some~~ local services and facilities are to be provided ~~within large~~ as part of any major developments, residents will likely travel into Reading ~~will inevitably be the main town that these developments rely upon for higher order infrastructure~~ for some activities such as shopping. Consideration of transport links from these areas into Reading should therefore make up ~~a major~~ part of the spatial strategy.”*

### **Figure 3.2**

WBC suggests that Figure 3.2 is modified to remove the South of the M4 Strategic Development Location for the reasons referred to in the response to paragraph 3.1.3.

### **Policy EN15 Air Quality**

Policy EN15 suggests that “*Development should have regard to the need to improve air quality...*” This narrow definition omits situations when transport ‘proposals’, intended to reallocate road-space to deliver bus priorities, contribute to additional congestion or result in longer fossil fuelled trips. Whilst WBC will generally support proposals to deliver more sustainable travel patterns, Policy EN15 should be changed to “*Proposals should....*” so that all proposals are required to achieve the same policy objective.

### **Policy EM1 Provision of employment**

WBC notes the statement within paragraph 4.3.5 that there is scope to accommodate the full level of employment need within Reading Borough.

### **Policy H1 Provision of housing**

Subject to the outcome of the transport assessment, WBC supports in principle Policy H1 in setting a housing requirement which equates to an average of 825 dwellings per annum.

It is noted that this exceeds the scale of housing need identified within the Reading Housing Needs Assessment July 2024 (735 dwellings per annum). It is further noted that whilst lower than the scale of housing need calculated by the national standard method under the NPPF 2023 (878 dwellings per annum), the proposed requirement exceeds the outcome before the additional step of the urban uplift is applied (650 dwellings per annum). Reading Borough Council have not defined any unmet housing need.

Whilst RBC are promoting the Reading Housing Needs Assessment July 2024 as the appropriate assessment of housing need, it is likely that other parties will promote the use of the national standard method.

It is important to acknowledge the advice contained within the NPPF 2023 regarding the standard method. NPPF paragraph 62 states:

*“The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework.”*

Footnote 27 expands stating:

*“In doing so, strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right places, to prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.”*

WBC’s reading of the above is that where a local authority is unable to meet housing need as calculated by the base formula, i.e. before the application of the urban uplift, cooperation between local authorities is expected to enable this need to be met. There is however no requirement or expectation on cooperation to meet the proportion of housing need required by the additional urban uplift stage.

For the avoidance of doubt, housing delivery in Wokingham Borough is highly dependent on developing greenfield land. Exporting any proportion of housing need required by the urban uplift to Wokingham Borough would require further significant greenfield land to be

utilised. This would be in clear conflict with the intended purpose of the urban uplift and national planning policy, and our view be inappropriate.

### **Policy TR1 Achieving the transport strategy**

Policy TR1, alongside Policies TR5 and CC7, outline aspirations for sustainable transport but the Plan focuses on walking, cycling and public transport. The NPPF includes ultra-low and zero emission vehicles in its definition of sustainable forms of transport. Given that many trips to Reading originate beyond the borough, it is important that supporting infrastructure serves all forms of sustainable transport.

### **Policy TR2 Major transport projects**

Policy TR2 supports the expansion of the Bus Rapid Transit (BRT) network. The policy references proposals for the southern (A33) and eastern (A4) corridors, identified on the Proposals Map. Limited evidence has been provided to inform proposals which is an essential part of the Sustainability Assessment / Strategic Environmental Assessment process to remove, reduce or mitigate adverse effects.

The adopted RBC Local Plan was supported by proposals to expand the network of Park & Ride sites in Wokingham Borough, serving destinations in Reading (generally retained in Figure 4.6). The Inspector's Examination Report (paragraph 77) considered these as necessary. The Plan suggests these might be replaced with mobility hubs, but these proposals are not supported by evidence to explain what form these hubs might take, how many might be necessary, where they might be located or any supporting infrastructure to enable longer range trips to shift mode to more sustainable alternatives. Whilst WBC are considering mobility hubs these are unlikely to be delivered until much later in the Plan period therefore RBC might need to support accelerated delivery close to the borough boundary.

### **Policy TR5 Car and cycle parking and electric vehicle charging**

The densification of central Reading is generally supported. Policy TR5 places a requirement on developments to *"...provide car and cycle parking are appropriate to accessibility..."* Most of the proposed development locations are in high accessibility areas, as such WBC anticipate the car parking provision will be minimal. With an increased reliance on active travel, WBC assumes that the Infrastructure Delivery Plan (IDP) will deliver significant cycleway improvements – extending into Wokingham Borough. Whilst RBC has published a Local Cycle Walking Infrastructure Plan it is important that



investment and infrastructure delivery are mutually conducive to exploiting the potential for active travel, requiring some refinement of the IDP.

Limited evidence<sup>1</sup> has been provided suggesting development travel demands, with the exception of hotels, are forecast to be comparable with city locations. Table 3.1-4 suggests traffic demands are much lower than comparable land uses within 1.2km of town centres/stations elsewhere in England. Given the scale of development planned, the forecasts in Table 3.5 and Figure 3.2-5 suggest that material changes would occur to the WBC network that require further examination and mitigation.

If the development forecasts form part of a wider 'Decide & Provide' approach to manage travel demand, it might be practical to reduce parking provision and/or align other parts of the IDP for non-car infrastructure/services. Until further evidence is provided, WBC is unable to support these plans.

### **Policy OU1 New and existing community facilities**

WBC supports the proposed general reliance on existing mainstream education provision in the Plan but notes that the proposals carry a low-level risk of insufficient school places being achieved within Reading Borough.

Most local authorities with education responsibilities are managing the effects of a falling birth rate on school rolls. Conversely, new housing development will bring additional children (credible child yield rates for new homes are set out in the Plan). However, this impact on demand may be localised, and at a borough level may not offset the roll reductions created by the falling birth rate. Moreover, in the context of new communities can rely on existing education provision either within walking distance of their homes or that is accessible by sustainable modes of travel.

If the borough child population were to increase (or capacity be reduced) in the period to 2041 beyond borough school capacity, a risk of overflow to schools within Wokingham Borough would arise. Currently there is some capacity in two key accessible areas (Earley and Woodley, but not Shinfield) but if birth numbers had risen across the west of Berkshire area, there would be a risk that some families from Wokingham Borough being unable to secure local places. WBC therefore seeks reassurance and wishes to understand the measures which would be activated to ensure that availability of increased capacity, should these circumstances arise.

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<sup>1</sup> Sustainable Connectivity and Vehicle Trip Distribution Study, Stantec, December 2024.

## **Policy OU2 Hazardous installations**

WBC welcomes the recognition of AWE Burghfield within Policy OU2 and the approach to development proposals within the Detailed Emergency Planning Zone (DEPZ). It is noted however that the policy makes no reference to the other consultation zones identified by the Office for Nuclear Regulation (ONR) and as a result is considered unsound.

WBC suggest the policy and supporting text is modified to include reference to the consultation zones surrounding AWE Burghfield set by ONR and proposals for development within all these zones being managed in the interests of public safety, emergency response, and national security and defence requirements. Such a modification would be consistent with the emerging policies in both the Wokingham Borough Council Local Plan Update Proposed Submission Plan and West Berkshire District Council Local Plan Review, which is currently at examination.

## **6. South Reading**

Figure 6.1 illustrates aspirations for the A33 to become a Bus Rapid Transit (BRT) route into Reading. Historically this was the basis for changes to B3031 Basingstoke Road corridor when the A33 was opened. If these proposals are intended to support greater levels of modal shift via the MereOak Park & Ride which is situated within Wokingham Borough, these should be supported by transport evidence to inform effects on the wider transport network.

Figure 6.1 also illustrates that the BRT would extend towards the A327 corridor, into the highway network within Wokingham Borough. The basis for BRT proposals contrasts with the Superbus network depicted in Figure 4.7, again highlighting the limitations of supporting evidence. Indeed, paragraphs 4.5.8 attempt to expand of BRT and Park & Ride sites, which might incorrectly reference Figure 4.9 (instead of 4.6), but supporting text for Mobility Hubs, suggests that Figure 4.9 might have been omitted.

## **8. Caversham & Emmer Green**

WBC supports Paragraph 8.2.1 which states RBC will continue to work with other local authorities towards the provision of a crossing of the River Thames, east of Reading. To realise air quality goals, RBC acknowledge this will require mitigation on the road network on either side of the crossing. WBC continue to work with RBC on this Major Road Network

(MRN) improvement but note that if achieved it will ultimately link the M4, A329(M), A3290 and A4155, supporting some redistribution of traffic in the wider area. Through the preparation of the Wokingham Borough Council Local Plan Update Proposed Submission Plan, WBC note that several parts of the local highway network are likely to require complementary improvements into the 2030's. If the Thames Crossing is delivered other improvements will be necessary in Wokingham Borough to support these plans affecting the eastern (A4) corridor.

### **Policy ER2 Whiteknights Campus, University of Reading**

WBC supports Policy ER2 Whiteknights Campus University of Reading. With the Whiteknights Campus straddling the administrative boundary, we are pleased to note it broadly aligns with Policy SS9 Whiteknights Campus of the Wokingham Borough Council Local Plan Update Proposed Submission Plan.

### **Sustainability Appraisal**

As noted under 'Spatial strategy and transport' above, given the limitations of the transport evidence, it is not possible to understand whether the impacts of the spatial strategy have been suitably assessed. Indeed, paragraph 3.4 of the sustainability appraisal acknowledges this issue. Even with additional evidence provided by Stantec (Dec'24) it will be necessary to align other parts of the plan before the Plan is submitted for examination.

### **Summary**

In summary, whilst WBC does not object to the principles and policies of the Plan, in the absence of more transport evidence, it is not possible to understand whether the impacts of the spatial strategy have been suitably assessed and therefore understood. Moreover that where the affects are likely to be detrimental that appropriate mitigations can or will be delivered within RBC and within Wokingham Borough.

WBC cannot therefore conclude that the impacts on the highway network in Wokingham Borough are acceptable. As a result, WBC must conclude at this time that the Duty to Cooperate has not been discharged and the Plan is unsound.

WBC are aware that a transport assessment is being progressed and wish to work proactively with RBC in reviewing this with a view to being able to confirm compliance with

the Duty to Cooperate and broad soundness in due course and before the Plan is submitted for examination.

WBC would be happy to participate in examination hearing sessions should the appointed Planning Inspector consider this helpful.

Yours sincerely,

*Ian Bellinger*

Ian Bellinger  
Head of Planning Policy  
Wokingham Borough Council

## **Appendix 7: Statement of Common Ground with West Berkshire District Council**

# **STATEMENT OF COMMON GROUND BETWEEN READING BOROUGH COUNCIL AND WEST BERKSHIRE DISTRICT COUNCIL**

**Regarding the Reading Borough Local Plan  
Partial Update**

**May 2025**

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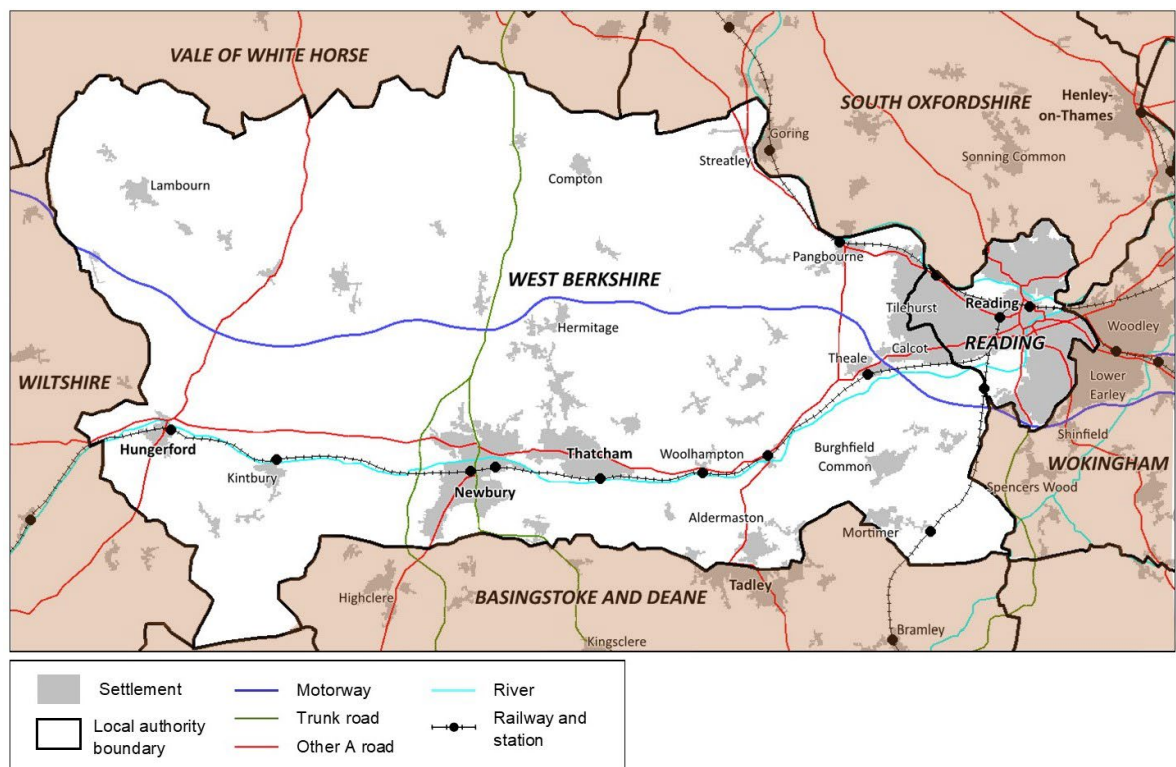
## 1. Introduction

- 1.1 This Statement of Common Ground has been prepared by West Berkshire District Council (WBDC) and Reading Borough Council (RBC), collectively referred to as “the parties”. It sets out matters that are agreed between the parties in relation to the preparation of the Reading Borough Local Plan Partial Update (LPPU) at submission stage.

## 2. Strategic geography

- 2.1 RBC and WBDC cover two adjacent unitary authorities in the former county of Berkshire. The boundary extends from the River Thames in the north west to the Green Park area in the south east, and has a total length of approximately 9 km. The area lies around 60-100 km west of London, with the River Thames, Kennet and Avon Canal, M4 motorway, Great Western main line and Paddington to Penzance rail line passing through both authorities.
- 2.2 Reading Borough covers the town and core urban area of Reading. It has a total area of 4,041 ha. It is generally urban in nature, with undeveloped parts of the Borough being mainly public open spaces and flood meadows.
- 2.3 West Berkshire covers a much larger and more rural area of around 70,400 ha and is characterised by a variety of settlements with the largest being Newbury, Thatcham and the urban part of the defined Eastern Area (consisting of Tilehurst, Purley on Thames and Calcot). The Eastern Area adjoins Reading Borough. Much of the district falls within the North Wessex Downs National Landscape, with the flood plain of the River Kennet and Kennet and Avon Canal also significant.

**Figure 1: Geography of the area**





- 2.4 The boundary between RBC and WBDC passes mainly through the wider Reading urban area and the Kennet Meadows, with the parishes of Purley on Thames, Tilehurst and Holybrook (within West Berkshire District) including areas that are part of a contiguous urban area with Reading.
- 2.5 The parties are linked by various roads, notably the M4, A4, and A329, as well as numerous suburban roads. The Great Western main line, Paddington to Penzance and Reading to Basingstoke railway lines also connect the authorities.

### **3. Local plan positions**

#### **Reading Borough Council**

- 3.1 The Reading Borough Local Plan was adopted in November 2019. A review of the Local Plan was carried out in March 2023 which identified a need to undertake a Partial Update of the Local Plan, covering approximately half of the policies within the plan.
- 3.2 A Consultation on Scope and Content (under Regulation 18) was carried out between 27<sup>th</sup> November 2023 and 31<sup>st</sup> January 2024.
- 3.3 A Pre-Submission Draft LPPU was subject to consultation under Regulation 19 between 6<sup>th</sup> November and 18<sup>th</sup> December 2024.
- 3.4 The plan will be submitted for examination under the transitional arrangements set out in the 2024 version of the National Planning Policy Framework (NPPF), meaning it will be examined against the requirements of the December 2023 NPPF.
- 3.5 The WBDC response to the Pre-Submission version of the LPPU is included as Appendix 1.

#### **West Berkshire District Council**

- 3.6 WBDC is undertaking a Local Plan Review (LPR) to cover the period to 2039, which is proposed to be modified to cover the period to 2041.
- 3.7 Three consultations on the proposed scope and content of the LPR (under Regulation 18) took place between 2018 and 2021.
- 3.8 The proposed submission (Regulation 19) version of the LPR was subject to consultation between 20<sup>th</sup> January and 3<sup>rd</sup> March 2023.
- 3.9 The LPR was submitted to the Secretary of State on 31<sup>st</sup> March 2023 and is currently undergoing public examination. Examination hearing sessions were held in May, June and October 2024, and, based on the outcomes of the hearing sessions and the additional work undertaken, a consultation on Main Modifications was undertaken between 6<sup>th</sup> December 2024 and 31<sup>st</sup> January 2025. The Inspector's Final Report was received on 8<sup>th</sup> April 2025, which concludes that the plan provides an appropriate basis for the planning of the district subject to the identified Main Modifications. Adoption is anticipated in May 2025.

## **Minerals and Waste Local Plan**

- 3.10 WBDC prepared its own Minerals and Waste Local Plan, which was adopted on 1<sup>st</sup> December 2022.
- 3.11 RBC worked jointly in the preparation of the Central and Eastern Berkshire Joint Minerals and Waste Plan with Wokingham Borough Council, Bracknell Forest Council and the Royal Borough of Windsor and Maidenhead. The plan was adopted in January 2023.
- 3.12 There is no published timetable for a review of either plan.

## **4. Strategic matters**

- 4.1 The parties have engaged to discuss relevant strategic cross boundary matters throughout the preparation of their respective plans. This has included engagement on the various evidence base documents which underpin emerging policies.
- 4.2 The duty to cooperate activities between the parties in relation to the LPPU are recorded in the RBC Duty to Cooperate Statement (April 2025).
- 4.3 The following are identified as strategic matters in RBC's Duty to Co-operate Statement (2024) upon which co-operation with WBDC is required.
  - a) Housing needs and provision
  - b) Needs and provision for gypsies and travellers
  - c) Needs and provision for economic development and town centres
  - d) Strategic transport infrastructure needs and provision
  - e) Strategic education infrastructure needs and provision
  - f) Strategic healthcare infrastructure needs and provision
  - g) Strategic landscape considerations
  - h) Strategic biodiversity considerations
  - i) Strategic flooding considerations
  - j) Climate change and mitigation
  - k) Open space and recreation provision
  - l) Historic environment
  - m) Tall buildings and strategic views
  - n) Utilities infrastructure needs and provision
  - o) Planning within the Detailed Emergency Planning Zone for AWE Burghfield
  - p) Planning for minerals
  - q) Planning for waste

### **a) Housing needs and provision**

- 4.4 The Berkshire (Including South Bucks) Strategic Housing Market Assessment (SHMA) identified West Berkshire District and Reading Borough as being part of a Western Berkshire Housing Market Area (HMA) centred on Reading and comprising the local authorities of Reading Borough Council, Bracknell Forest Council, West

Berkshire District Council and Wokingham Borough Council. Whilst HMAs are no longer specifically referenced in the NPPF, the accompanying Planning Practice Guidance: Plan-Making references them in the context of cooperation. The parties agree that for West Berkshire and Reading, the Western Berkshire HMA is the core area for cooperation on the planning of housing.

- 4.5 The adopted Reading Borough Local Plan identified a modest total shortfall of 230 dwellings in total, to be delivered within the Western Berkshire HMA. A Memorandum of Understanding across the four Western Berkshire HMA authorities agreed that this unmet need would be delivered in the HMA, without specifying an authority or location. Both parties agree that this position is now out-of-date as housing needs have changed, and RBC is now able to deliver this shortfall in full within its own boundaries over the plan period to 2036. There is no unmet need arising from other local authorities within the Western Berkshire Housing Market Area.
- 4.6 The level of housing need in the LPPU is based upon the Reading Housing Needs Assessment (HNA). This identified a need for 735 homes per year up to 2041. WBDC was involved as a stakeholder in the production of the HNA. Both parties agree that the operation of the standard method in the December 2023 version of the NPPF would result in a higher level of housing need of 878 homes per year (at the time of publication of the LPPU Regulation 19). WBDC acknowledges that use of the standard methodology would likely result in unmet needs from Reading, but no scope to accommodate these needs in West Berkshire in those circumstances has been identified.
- 4.7 Based on the level of need from the HNA, both parties agree that the LPPU meets its housing needs within Reading's boundaries, seeking to deliver 825 homes per year and does not result in unmet housing need from Reading.
- 4.8 For WBDC, the proposed submission version of the LPR (January 2023) was based on the outcome of the standard method at the time which resulted in a housing need of 513 dwellings per year. Policy SP12 plans for 513 to 538 dwellings per year between 2022 and 2039, meeting West Berkshire's needs in full for that period. Proposed main modification MM18 (November 2024) would modify this policy to plan for a minimum of 515 dwellings per year between 2023 and 2041, which is the updated outcome of the standard method at the time of submission, which is a total delivery of at least 9,270 homes over the plan period. No unmet needs therefore arise from West Berkshire.
- 4.9 The parties agree that using the approaches taken in the respective plans, both plans make provision to meet their own housing needs in full, with land supply in Reading expected to exceed need over the plan period.

#### **b) Needs and provision for gypsies and travellers**

- 4.10 A Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment was carried out to support the now-adopted Reading Borough Local Plan. This identified a need for 10-17 permanent pitches for gypsies and travellers. Despite an exhaustive process of searching for sites, the Local Plan was unable to identify land to meet this need. A Duty to Co-operate process was followed with neighbouring authorities to seek to identify land outside Reading

Borough to meet this unmet need but no sites were identified and no authority was in a position to plan to meet any of this unmet need.

- 4.11 No additional sites have emerged within Reading since the Local Plan was adopted in 2019 that offer potential to meet the unmet need for permanent pitches. No changes from the adopted plan are proposed to policy H13 on provision for gypsies and travellers or to any allocated sites that would provide for gypsies and travellers. An unmet need from Reading Borough therefore remains in exactly the same way as with the adopted plan. RBC continues to explore options with surrounding local authorities for this need to be accommodated outside of Reading Borough.
- 4.12 WBDC needs to deliver 17 permanent Gypsy and Traveller pitches in the period to 2038. The allocations included within WBDC's existing Local Plan are being rolled forward into the LPR and no additional sites are proposed. There may also be a need for additional pitches between 2038 and 2041 but that has not been quantified. The WBDC Local Development Scheme includes a commitment to consider the matter when the LPR is reviewed. The parties agree to maintain open dialogue on unmet gypsy and traveller accommodation needs.

#### **c) Needs and provision for economic development and town centres**

- 4.13 The needs and provision for economic development and town centres in the LPPU are based on the results of a Commercial Development Needs Assessment (CDNA, 2024).

#### *Economic development*

- 4.14 In terms of economic development, the Berkshire Functional Economic Market Area (FEMA) study that underpinned the adopted Local Plan identified a Central Berkshire FEMA, centred on Reading and comprising the authorities of Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead, and Wokingham Borough Council. West Berkshire was identified as a separate FEMA in its own right, albeit that the study noted a close relationship between the two FEMAs. The FEMA is not referenced in the LPPU itself, but it nonetheless provides a useful basis for undertaking co-operation.
- 4.15 The needs for economic development are developed from a range of scenarios in the CDNA, but the need figures on which the LPPU are based arise from the 'blended scenario' minus the safety margin and allowance for future losses, and are as follows:
- 85,803 sq m of office floorspace; and
  - 167,113 sq m of industrial, warehouse and research and development floorspace.
- 4.16 Policy EM1 provides to meet up to this level of need before safety margins and losses, with the provision for office development expressed as a range between assessed specific capacity and the identified need. As such, the parties agree that the policy provides to meet full economic development needs for Reading within Reading Borough.

- 4.17 In terms of specific locations for employment development, further matters are considered in relation to the AWE Detailed Emergency Planning Zone (paragraphs 4.45 to 4.46).
- 4.18 The need for employment land within West Berkshire has been identified through an updated Employment Land Review (2022). This recommended a need for a net increase in office space of 50,816 sq m and for industrial space of a minimum of 91,109 sq m or 23 ha of land to 2039. Proposed main modification MM30 would amend these figures to 57,531 sq m (office) and 98,196 sq m or 24.5 ha (industrial) to 2041. WBDC has positively sought opportunities to meet this need, including through the duty to co-operate, but the LPR has been unable to identify sites to meet the need in full. The office need is unmet in full, and there would be an unmet need of 39,796 sq m of industrial space after the employment allocations in the LPR (as amended by proposed main modifications) are taken into account.
- 4.19 The adopted Reading Borough Local Plan (2019) had some scope to meet unmet office needs from elsewhere as identified in policy EM1. However, this situation has changed with the LPPU due to changes to need levels and increased housing need, and Reading is now only able to meet its own economic development needs within its boundaries.
- 4.20 WBDC has committed to seek to address the matter of unmet employment needs again at the first five year review of the Local Plan. The parties agree to continue to discuss this matter as part of that process, informed by any updated information on employment land needs and supply in both authorities.

#### *Town centres*

- 4.21 The CDNA for Reading found an overprovision of 5,467 sq m of comparison goods floorspace up to 2041 and a very small positive need of 428 sq m of convenience goods. This small positive need can be accommodated by reallocation of existing retail space between comparison and convenience. As such no positive need for new development arises and Policy RL2 plans only for sufficient provision to maintain the vitality and viability of the network and hierarchy of centres. There is no unmet need to be accommodated elsewhere.
- 4.22 The need for retail land in West Berkshire was initially identified through the Western Berkshire Retail and Commercial Leisure Assessment 2016 (jointly undertaken with RBC as well as Wokingham Borough Council and Bracknell Forest Council) and identified an additional need of 25,600 sq m of comparison goods floorspace to 2036. However, this need is now outdated due to significant changes in retail in recent years, and there is no updated evidence available to support the LPR. As such, WBDC has committed to a review of retail needs in the first five year review of the Local Plan.
- 4.23 The parties agree to discuss any cross-boundary implications arising from changes to retail or other town centre needs as part of the first five year review of WBDC's Local Plan. However, the parties also agree that the scale of retail and town centre development planned for in the LPPU is unlikely to give rise to particular cross-boundary impacts.

#### **d) Strategic transport infrastructure needs and provision**

- 4.24 The overall transport strategy is set out in Policy TR1 of the LPPU.
- 4.25 A Transport Modelling Report has been prepared to support the LPPU which has been provided to WBDC for input prior to its finalisation. WBDC notes the conclusions of the report and also the Addendum report and reserves the right to provide further comment on its contents.
- 4.26 Figure 4.6 of the LPPU identifies three transport corridors that extend into West Berkshire District that would be subject to multi-modal enhancements – the A329 (Oxford Road), A4 (Bath Road) and Tilehurst Road/The Meadway. The parties agree to maintain dialogue about the nature of these multi-modal enhancements.
- 4.27 Figure 4.7, taken from the Reading Transport Strategy, identifies the future public transport network in Reading and identifies that two of these corridors, the A329 and A4, would be locations for future park and ride provision (West P&R and South West P&R). Park and ride mobility hubs are a key element of policy TR2 on major transport projects. There are no sites within Reading Borough that would be available or suitable for park and ride mobility hubs, which means that new park and ride mobility hub provision on these corridors would need to be located in West Berkshire District. However, no sites have been identified at this stage. The parties agree to continue to work together to identify and consider opportunities for park and ride mobility hub provision over the plan period.

#### **e) Strategic education infrastructure needs and provision**

- 4.28 The level of growth proposed in the LPPU results in needs for new education provision, which is outlined in the Infrastructure Delivery Plan. The additional needs are related to special educational needs, early years and some specialist provision, and places to fulfil these needs should be delivered within Reading without reliance on adjoining areas. The parties agree that on this basis there should not be any additional cross-boundary implications.

#### **f) Strategic healthcare infrastructure needs and provision**

- 4.29 The level of growth proposed in the LPPU results in needs for new healthcare provision, which is outlined in the Infrastructure Delivery Plan, and sites in the LPPU are identified where possible. The parties agree that this will not result in additional cross-boundary implications.

#### **g) Strategic landscape considerations**

- 4.30 The main cross-boundary landscapes of significance are the Kennet Meadows, the Thames Valley and a network of woodlands in West Reading and Tilehurst. These areas are identified as major landscape features in the LPPU, and the parties agree that the level and nature of development proposed will not give rise to cross-boundary concerns relating to strategic landscape.

#### **h) Strategic biodiversity considerations**

- 4.31 This issue has been identified as habitats cross boundaries, and the fragmented nature of habitats within the urban area of Reading means a particular emphasis on



links between habitats and towards undeveloped areas often in adjoining authorities. The main strategic habitats that cross the boundary between Reading and West Berkshire are the Kennet Meadows and the West Reading Woodlands (identified as Biodiversity Opportunity Areas). The parties do not expect the growth identified in the LPPU to have cross-boundary implications on these locations in terms of biodiversity.

#### **i) Strategic flooding considerations**

- 4.32 A Strategic Flood Risk Assessment (Level 1) has been prepared to identify the level of flood risk in Reading. The parties do not expect the growth identified in the LPPU to have cross-boundary implications in terms of flood risk.

#### **j) Climate change and mitigation**

- 4.33 The parties have both declared a Climate Emergency – RBC in February 2019 and WBDC in July 2019. At the time of declaration, RBC stated its aim for a carbon neutral Reading by 2030. The LPPU contains policies to ensure that development plays its part in achieving this aim, and the parties agree that this approach is sound.

#### **k) Open space and recreation provision**

- 4.34 This issue is identified due to the potential for existing or new areas of open space to cross boundaries. The LPPU does not propose any changes that would affect cross-boundary open space.

#### **l) Historic environment**

- 4.35 This issue is identified mainly due to the presence of two conservation areas (Routh Lane and Horncastle) within Reading but adjacent to the boundary with West Berkshire, and with areas within West Berkshire contributing to their setting. The parties agree that no change is proposed in the LPPU that would be likely to result in a cross-boundary impact on the historic environment.

#### **m) Tall buildings and strategic views**

- 4.36 This issue is identified due to tall buildings in Reading town centre being, or becoming, visible from within West Berkshire District. The parties agree that no change is proposed in the LPPU that would be likely to result in a greater cross-boundary impact.

#### **n) Utilities infrastructure needs and provision**

- 4.37 The level of growth proposed in the LPPU results in needs for electricity upgrades, which are outlined in the Infrastructure Delivery Plan. The parties agree that this will not result in additional cross-boundary implications.

#### **o) Planning within the Detailed Emergency Planning Zone for Atomic Weapons Establishment (AWE) Burghfield**

- 4.38 AWE plc operates AWE Burghfield and AWE Aldermaston, which are situated within West Berkshire District. The sites are operated on behalf of the Ministry of Defence and are nuclear licensed sites. WBDC is the lead local authority for emergency planning for AWE Burghfield and AWE Aldermaston and is the owner of the AWE Off-Site Emergency Plan (OSEP).

- 4.39 A Detailed Emergency Planning Zone (DEPZ) is defined around both sites with that for AWE Burghfield (AWE B) extending into West Berkshire District, Wokingham Borough and Reading Borough.

#### *Policy OU2*

- 4.40 Policy OU2 of the LPPU states that any proposal for development within the DEPZ that would increase the residential or non-residential population and level of activity will not be acceptable unless it does not prejudice the security and future of AWE B, and any increase in population within the DEPZ can be accommodated in the context of the OSEP.
- 4.41 WBDC strongly supports the principles and intention of the policy. However, WBDC considers that a number of changes need to be made to the policy. These are set out in full in Appendix 1, but in summary:
- The policy should be split so that AWE is not dealt with in the same policy as sites under the Control of Major Accident Hazards (COMAH) regulations.
  - The policy should refer to the consultation zones from the regulator for nuclear matters the Office for Nuclear Regulation (ONR) and its land use planning process.
  - The policy should make clear that a recommendation by the ONR of refusal by the ONR will be given significant weight in the decision making process.
  - Reference needs to be made that the 'zones' size may change over time as a result of legislation, guidance or operational changes on the AWE site.
  - Other wording changes to the policy and supporting text for clarity.
- 4.42 RBC is open to a discussion on these matters through the examination process, but is concerned that some of these changes would constitute 'main modifications' that would require consultation. As such, only limited changes have been proposed to the submission version of the LPPU.
- 4.43 The parties agree that policy approaches across the entire DEPZ should be aligned and commit to continue to work together to achieve this. The parties also agree to continue to work together in relation to the approach to the DEPZ more generally, including monitoring development and on individual planning applications.

#### *Location of development within the DEPZ*

- 4.44 The LPPU proposes to meet residential development needs entirely outside of the AWE DEPZ (other than existing permissions). The LPPU allocates no new sites for any use within the DEPZ. However, sites for employment development within the adopted Local Plan that fall within the DEPZ are retained, specifically:
- SR1a: Former Landfill, Island Road
  - SR1c: Island Road A33 Frontage
  - SR4e: Part of former Berkshire Brewery site
- 4.45 WBDC is concerned with the retention of these three site allocations in terms of their potential impact on the OSEP. However, both parties recognise that, without these three sites, RBC would be unable to meet any significant proportion of its identified



industrial, warehouse and research and development needs, and this would result in unmet employment needs. Both parties therefore agree to continue to work together on understanding the impacts of these retained allocations in terms of the OSEP.

#### **p) Planning for minerals**

- 4.46 All matters are dealt with in by the duty to co-operate measures associated with the respective adopted minerals and waste local plans.

#### **q) Planning for waste**

- 4.47 All matters are dealt with by the duty to co-operate measures associated with the respective adopted minerals and waste local plans.

### **5. Areas of agreement**

- 5.1 The parties have engaged effectively and on an on-going basis during the plan making process in accordance with the Duty to Cooperate.
- 5.2 The parties agree the following statements of common ground:
- a) The parties agree that under the approaches taken in the LPPU and the WBDC LPR, there is no unmet need for housing arising from either authority.
  - b) The parties agree that there is an unmet need for Gypsy and Traveller accommodation arising from Reading Borough and that an open dialogue on this will continue.
  - c) The parties agree that there is no unmet need for town centre development arising Reading Borough, and that meeting the needs for employment development is dependent on the retention of allocated sites in the AWE DEPZ.
  - d) The parties agree that the evidence supporting the LPPU is robust and proportionate to the plan-making stage of planning.
  - e) The parties will continue engagement relating to plan-making as appropriate and necessary.
  - f) The parties will continue to engage through the planning application process on development proposals in vicinity of the administrative boundary, or further afield where there is potential for cross boundary impacts.

### **6. Areas of further work or disagreement**

- 6.1 Further engagement on both parties unmet needs for Gypsy and Traveller provision will continue.
- 6.2 Engagement between the parties as part of the first five year review of WBDC's LPR will consider the matter of WBDC's unmet employment needs and any updated evidence on retail needs.
- 6.3 Further engagement between the parties will continue on major transport projects including park and ride mobility hubs and transport corridor enhancements.

- 6.4 Engagement on matters relating to the AWE Burghfield Detailed Emergency Planning Zone and the Off-Site Emergency Plan will continue. The parties have not reached agreement at this stage on the wording of policy OU2, and WBDC remains concerned about the retention of allocated employment sites within the DEPZ.

## **7. Governance Arrangements Including Future Review of the SoCG**

- 7.1 The parties agree to:
- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies;
  - Review and update this Statement of Common Ground in the light of any material change in circumstance; and
  - Maintain positive principles of cooperation.

## **8. Signatories**

- 8.1 We confirm that the information in this Statement of Common Ground reflects the joint working and engagement undertaken to date to address identified strategic matters. The parties will continue to work together to address cross boundary issues.

Signed for Reading Borough Council



Name: Matthew Golledge

Position: Acting Assistant Director for Planning, Transport and Public Protection

Date: 7 May 2025

Signed for West Berkshire District Council

*Laura Callan*

Name: Laura Callan

Position: Service Lead - Planning

Date: 8 May 2025

## **Appendix 1: West Berkshire District Council response to the Pre-Submission Draft Local Plan Partial Update**



18 December 2024

Sent by email:  
[planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

**Planning Policy**

Development and Planning  
West Berkshire District Council  
Market Street, Newbury  
Berkshire, RG14 5LD

**Please ask for:** Planning Policy Team  
**Direct dial:** 01635 519 111  
**Fax:** 01635 519 408  
**e-mail:** [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk)

Dear Sir/Madam,

**Reading Local Plan Update – Regulation 19 Proposed Submission Consultation**

Thank you for consulting West Berkshire District Council (WBDC) as part of the Regulation 19 consultation on the Reading Local Plan Update (LPU).

WBDC works closely with Reading Borough Council (RBC) and other neighbouring authorities to consider strategic planning issues in the area. The four authorities which make up the Western Berkshire Housing Market Area (WBDC, WBC, Bracknell Forest, and Reading) have co-operated on a Statement of Common Ground that details the situation regarding strategic matters across the area.

As WBDC has engaged with the LPU through its preparation, it considers that the duty to cooperate as far as WBDC is concerned has been fulfilled.

WBDC therefore welcomes the publication of the Reading Local Plan Update for the Regulation 19 proposed submission consultation and welcomes the opportunity to provide comment.

In terms of individual policies in the Plan, WBDC has the following comments:

**EM1: Provision of Employment Development**

As RBC are aware, WBDC has unmet employment floorspace needs over the LPR plan period to 2041. We note that whilst the LPU proposes to meet the identified needs for office and industrial / warehouse in full, the levels of need identified within the LPU are before the application of a safety margin and an allowance for future losses. It is also noted that there is no scope for unmet needs from other authorities to be accommodated.

**EM2: Location of New Employment Development**

It is recognised that two of the Core Employment Areas are existing designations in the RBC Local Plan – EM2a Green Park and EM2b North of M4. When originally designated these two employment areas were not located within the Detailed Emergency Planning Zone for the AWE, Burghfield, however, since the Zone has been expanded, they are now located within it. The

Council has concerns that any development within this area may lead to additional 'population' and intensification in an area in close proximity to the AWE sites, placing more stress on the AWE Off-Site Emergency Plan which is already significantly under stress. There is therefore an inherent tension in the Plan regarding development within the DEPZ which we consider needs to be addressed. Please see further comments below in relation to SR1 and SR4.

#### Policy H1: Provision of Housing

WBDC acknowledges RBC's position with regards housing needs over the LPU period 2023 to 2041.

WBDC also notes that Reading Borough Council's position is that its Partial Update to the Local Plan will meet its housing needs in full as identified through an alternative approach to calculating housing need rather than the Local Housing Need (LHN) identified under the standard methodology. It welcomes the intention that under this approach the Regulation 19 version of the Partial Update plans for the provision of 825 dwellings per annum compared to the identified need of 735 dwellings per annum, and therefore it is not intended that there will be any unmet needs to be accommodated in neighbouring authorities.

However, WBDC acknowledges that the approach proposed to be taken will come under scrutiny and under the current standard methodology the identified housing need for the Borough over the plan period 2023 – 2041 would be higher. In the event that the current standard methodology was to be used to identify housing need within Reading Borough, WBDC acknowledges there would be a shortfall in provision.

As you are aware WBDC is currently at examination with its Local Plan Review (LPR). A Post Hearing Letter was published by the Inspector on 31 July 2024 ([IN30](#)) setting out some interim findings and further action points for WBDC. In his letter the Inspector identified that there could be a shortfall in housing provision over the plan period of around 850 dwellings. As such the Inspector requested WBDC consider how the LPR could be modified to boost the housing land supply in light of the possible shortfall identified.

WBDC has identified additional provision, and this forms part of the consultation on the proposed Main Modifications which is running from 6 December 2024 until 31 January 2025. Given the current circumstances WBDC is not currently in a position to assist Reading with any unmet need that might arise within Reading Borough over the plan period to 2041.

WBDC is committed to an early review of the Local Plan and can, if necessary, consider this request again as part of this work. We will continue to work closely with Reading Borough Council and other neighbouring authorities in considering strategic planning issues in the area.

#### Policy H13: Provision for Gypsies and Travellers

WBDC notes that there are existing needs identified, and that no sites have been identified which could meet the permanent or transit need. We support the inclusion of policy H13 which supports proposals for Gypsies and Traveller accommodation subject to certain criteria.

WBDC needs to deliver 20 permanent Gypsy and Traveller pitches in the period to 2038. There is no requirement to identify a site for transit pitches, however WBDC's 2021 Gypsy, Traveller and Travelling Showpersons Assessment recommends that tolerated stopping places or negotiated stopping places should be provided.

The allocations included within WBDC's existing Local Plan are being rolled forward into the LPR and no additional sites are proposed. WBDC has commenced work on a Gypsy and Traveller Accommodation Development Plan Document (DPD) which will contain policies and allocations to meet the Gypsy and Traveller accommodation needs.

At this point in time, WBDC are unable to accommodate any of RBC's unmet needs. Nonetheless, as part of the Duty to Cooperate, WBDC will continue to liaise with RBC as work on the DPD progresses and will advise whether it will be possible to meet needs within West Berkshire district or not.

#### Policy OU2: Hazardous Installations (Strategic Policy)

The principles and intention of this policy are strongly supported. There are concerns that the policy and supporting information is not as clear as it could be though. In this context, WBDC suggests the policy and its supporting text would benefit from some clarity, including additional specifics in relation to ONR land use policy criteria and associated commentary where there are gaps and tightening required as follows:

##### Policy text:

Overall, it is considered that having the information in relation to hazardous substances concerns, hazardous sites or pipelines with a separate paragraph in relation to AWE Burghfield matters in the same policy is confusing, not least since there is a separate heading in the explanatory notes in relation to AWE Burghfield. It is therefore recommended that they are split to make clear the distinction such that hazardous substances concerns, hazardous sites or pipelines in the main relate to Control of Major Accident Hazard Regulations 2005 (COMAH) sites and Major Accident Hazard Pipelines 1996 (MAHP) as defined by the Health and Safety Executive.

It is recommended the additional policy paragraph in relation to AWE in the strategic policy, regardless of splitting it into a new separate policy, is changed for the following reasons:

- a. There is no mention of the consultation zones referred to and used in the ONR land use planning process so the Outer Consultation Zone, 12km zone and special cases as detailed in their website: [Land use planning | Office for Nuclear Regulation](#).
- b. in that the first bullet point at the end is amended to be **and/or** relating to the second bullet point.
- c. As regulator, should the ONR recommend refusal, the policy should make clear that this recommendation will be given significant weight in the decision making process.
- d. Reference needs to be made that the 'zones' size may change overtime as a result of legislation, guidance or operational changes on the AWE site.

##### Supporting text:

4.7.14. - this paragraph appears to relate mainly to the COMAH sites and therefore the additional commentary relating to '*and, for nuclear licensed sites, the Office for Nuclear Regulation (ONR), acting jointly with.....*' is incorrect for COMAH sites, appears to contradict itself later in the same paragraph and is generally confusing. As a result, as a minimum the paragraph needs to be reworded to be clearer, and if not, the elements relating to nuclear sites removed and placed in a separate policy for clarity.

Para 4.7.15 - it is correct to remove inner/middle and outer zones however as detailed above the full details of the ONR land use planning consultation criteria should be referred to, noting these can change and therefore reference to their website is advised to allow for these changes

Para 4.7.16 - this paragraph could be clearer and reworded for accuracy in that the process is that Emergency Planning within RBC will be consulted, who along with WBDC, who are the responsible Council for the AWE Off-Site Emergency Plan (OSEP), along with the AWE Off-Site Emergency Planning Group, as necessary, are best placed to judge how the proposal will impact the OSEP and therefore the health, safety and wellbeing of the community.

The second sentence in paragraph 4.7.16 should also relate to the ONR land use planning process and website.

Para 4.7.17 - it is unclear as to the reason for this paragraph.

#### Policy SR1 and Policy SR4

Both of these overarching policies include specific allocations to meet the employment requirements over the plan period. As outlined above some of these allocations are now within the DEPZ (SR1a / SR1c and SR4e) which creates an inherent tension with policy OU2. WBDC has significant concerns about the inclusion of allocations within this area and their potential impact on the OSEP. As such, WBDC would welcome further discussions relating to their inclusion and would welcome the opportunity to enter into a short Statement of Common Ground in this regard.

It is hoped that these comments are helpful. The Council may also wish to participate in the relevant hearing session(s) should the Inspector consider that appropriate.

Yours faithfully,

*Laura Callan*

Laura Callan  
Service Lead – Planning

## **Appendix 8: Statement of Common Ground with Bracknell Forest Council**



# **STATEMENT OF COMMON GROUND BETWEEN READING BOROUGH COUNCIL AND BRACKNELL FOREST COUNCIL**

**Regarding the Reading Borough Local Plan  
Partial Update**

**May 2025**

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## 1. Introduction

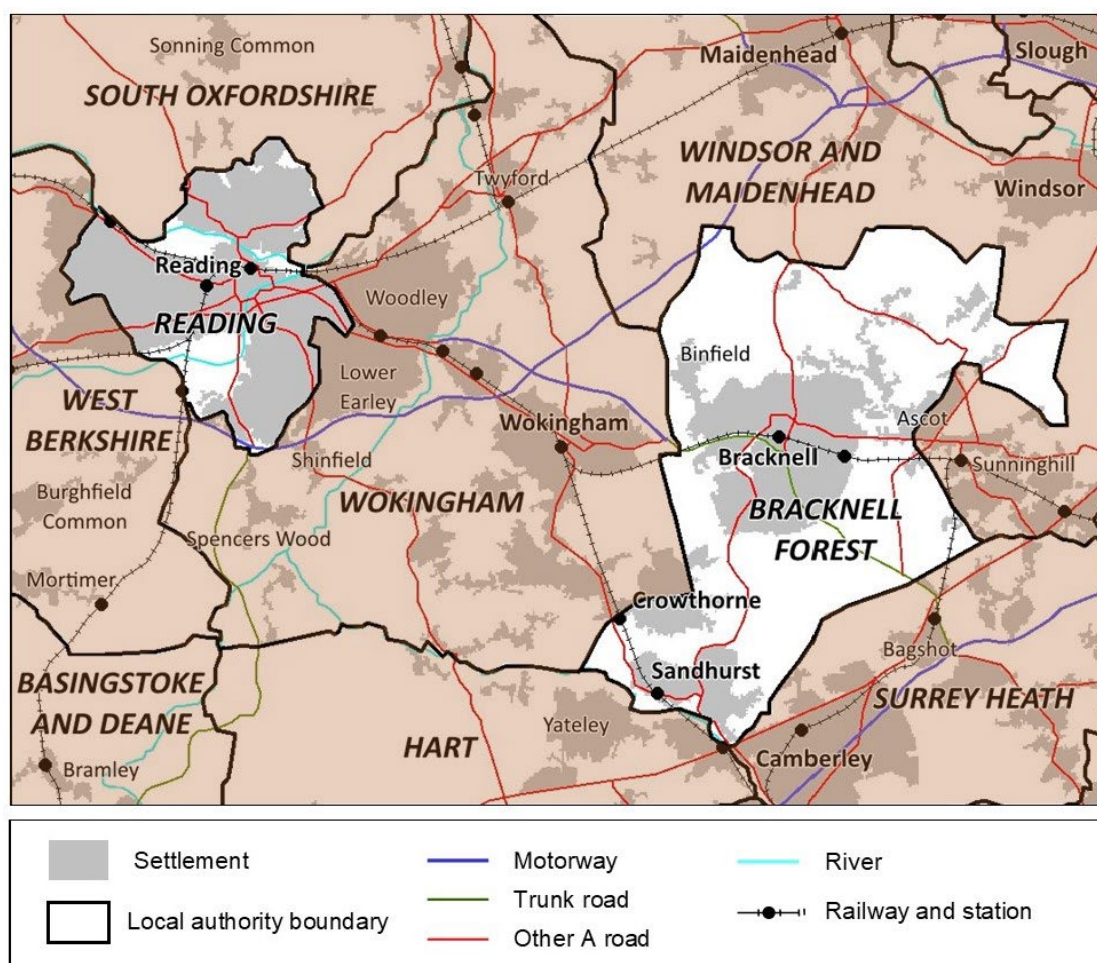
- 1.1 This Statement of Common Ground has been prepared by Bracknell Forest Council (BFC) and Reading Borough Council (RBC), collectively referred to as “the parties”. It sets out matters that are agreed between the parties in relation to the preparation of the Reading Borough Local Plan Partial Update (LPPU) at submission stage.

## 2. Strategic geography

- 2.1 RBC and BFC cover two unitary authorities in the former county of Berkshire. There is no shared boundary between the authorities, and the two authorities are approximately 9 km from one another at the closest point.

- 2.2 Reading Borough covers the town and core urban area of Reading. It has a total area of 4,041 ha. It is generally urban in nature, with undeveloped parts of the Borough being mainly public open spaces and flood meadows.
- 2.3 Bracknell Forest covers an area of 10,910 ha and is centred on the town of Bracknell, but also includes other towns and villages, the largest of which are Sandhurst and Crowthorne. It is a mix of urban and rural areas, and includes elements of the Metropolitan Green Belt and a part of the Thames Basin Heaths Special Protection Area, which is an area of international significance for ground nesting birds.

**Figure 1: Geography of the area**



- 2.4 The authorities are linked by the A329(M) and the Reading to London Waterloo railway line. The nature of these direct transport links mean that there is a strong functional relationship between Reading and Bracknell Forest despite not sharing a boundary.

### 3. Local plan positions

#### Reading Borough Council

- 3.1 The Reading Borough Local Plan was adopted in November 2019. A review of the Local Plan was carried out in March 2023 which identified a need to undertake a

Partial Update of the Local Plan, covering approximately half of the policies within the plan.

- 3.2 A Consultation on Scope and Content (under Regulation 18) was carried out between 27<sup>th</sup> November 2023 and 31<sup>st</sup> January 2024.
- 3.3 A Pre-Submission Draft LPPU was subject to consultation under Regulation 19 between 6<sup>th</sup> November and 18<sup>th</sup> December 2024.
- 3.4 The plan will be submitted for examination under the transitional arrangements set out in the 2024 version of the National Planning Policy Framework (NPPF), meaning it will be examined against the requirements of the December 2023 NPPF.
- 3.5 The BFC response to the Pre-Submission version of the LPPU is included as Appendix 1.

### **Bracknell Forest Council**

- 3.6 The Bracknell Forest Local Plan was adopted on 19<sup>th</sup> March 2024. This is supported by saved policies in the Site Allocations Local Plan (2013). A new Local Development Scheme was agreed by BFC's Cabinet on 18<sup>th</sup> March 2025. It contains a timetable for the review of the Local Plan.

### **Minerals and Waste Local Plan**

- 3.7 RBC and BFC worked jointly in the preparation of the Central and Eastern Berkshire Joint Minerals and Waste Plan with Wokingham Borough Council and the Royal Borough of Windsor and Maidenhead. The plan was adopted in January 2023. There is no published timetable for its review.

## **4. Strategic matters**

- 4.1 The parties have engaged to discuss relevant strategic cross boundary matters throughout the preparation of their respective plans. This has included engagement on the various evidence base documents which underpin emerging policies.
- 4.2 The duty to cooperate activities between the parties in relation to the LPPU are recorded in the RBC Duty to Cooperate Statement (May 2025).
- 4.3 The following are identified as strategic matters in RBC's Duty to Co-operate Statement (2025) upon which co-operation with BFC is required.
  - a) Housing needs and provision
  - b) Needs and provision for gypsies and travellers
  - c) Needs and provision for economic development and town centres
  - d) Strategic transport infrastructure needs and provision
  - e) Strategic healthcare infrastructure needs and provision
  - f) Climate change and mitigation
  - g) Planning for minerals
  - h) Planning for waste

#### **a) Housing needs and provision**

- 4.4 The Berkshire (Including South Bucks) Strategic Housing Market Assessment (SHMA) identified Bracknell Forest and Reading as being part of a Western Berkshire Housing Market Area (HMA) centred on Reading and comprising the local authorities of Reading Borough Council, Bracknell Forest Council, West Berkshire District Council and Wokingham Borough Council. Whilst HMAs are no longer specifically referenced in the NPPF, the accompanying Planning Practice Guidance: Plan-Making references them in the context of cooperation. The parties agree that for Bracknell Forest and Reading Borough, the Western Berkshire HMA is the core area for cooperation on the planning of housing.
- 4.5 The adopted Reading Borough Local Plan identified a modest total shortfall of 230 dwellings in total, to be delivered within the Western Berkshire HMA. A Memorandum of Understanding across the four Western Berkshire HMA authorities agreed that this unmet need would be delivered in the HMA, without specifying an authority or location. Both parties agree that this position is now out-of-date as housing needs have changed, and RBC is now able to deliver this shortfall in full within its own boundaries over the plan period to 2036. There is no unmet need arising from other local authorities within the Western Berkshire Housing Market Area.
- 4.6 The level of housing need in the LPPU is based upon the Reading Housing Needs Assessment (HNA). This identified a need for 735 homes per year up to 2041. BFC was involved as a stakeholder in the production of the HNA and considers the methodology to be robust. Both parties agree that the operation of the standard method in the NPPF would result in a higher level of housing need of 878 homes per year (at the time of publication of the LPPU Regulation 19) but consider that exceptional circumstances exist for use of the HNA figure.
- 4.7 Based on the level of need from the HNA, both parties agree that the LPPU meets its housing needs within Reading's boundaries, seeking to deliver 825 homes per year and does not result in unmet housing need from Reading.
- 4.8 For BFC, the adopted Local Plan is based on a local housing need figure of 614 homes per year up to 2037, using the standard method set out in national guidance with a baseline of 2020. Policy LP4 provides to meet this need in full, with an additional supply to allow for flexibility. No unmet needs arise from Bracknell Forest.
- 4.9 The parties agree that both plans make provision to meet their own housing needs in full with land supply expected to exceed need in both cases over the plan period. However, whilst not considering this a soundness issue, BFC has some concerns that the wording of the policies relating to allocated sites in the LPPU could lead to an underprovision in supply, which are outlined in detail in Appendix 1.
- 4.10 The parties agree to continue necessary engagement regarding infrastructure provision.

#### **b) Needs and provision for gypsies and travellers**

- 4.11 A Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment was carried out to support the now-adopted Reading Borough Local Plan. This identified a need for 10-17 permanent pitches for gypsies

and travellers. Despite an exhaustive process of searching for sites, the Local Plan was unable to identify land to meet this need. A Duty to Co-operate process was followed with neighbouring authorities to seek to identify land outside Reading Borough to meet this unmet need but no sites were identified and no authority was in a position to plan to meet any of this unmet need.

- 4.12 No additional sites have emerged within Reading since the Local Plan was adopted in 2019 that offer potential to meet the unmet need for permanent pitches. No changes from the adopted plan are proposed to policy H13 on provision for gypsies and travellers or to any allocated sites that would provide for gypsies and travellers. An unmet need from Reading Borough therefore remains in exactly the same way as with the adopted plan. RBC continues to explore options with surrounding local authorities for this need to be accommodated outside of Reading Borough.
- 4.13 BFC's Gypsy and Traveller Accommodation Assessment 2022 identified a residual need of 8 permanent pitches, with 4 required in 2021-26 and 4 in 2026-37. The Local Plan provides to meet the needs over the first five year period through regularisation of unauthorised sites, and states that there is an intention to meet the need for gypsy pitches. There is also a need for 5 travelling showperson plots which it is envisaged will be met through the intensification of existing plots. No potential has been identified to meet any unmet needs from elsewhere, including Reading. The parties agree to maintain open dialogue on unmet gypsy and traveller accommodation needs.

### **c) Needs and provision for economic development and town centres**

- 4.14 The needs and provision for economic development and town centres in the LPPU are based on the results of a Commercial Development Needs Assessment (CDNA, 2024).

#### *Economic development*

- 4.15 In terms of economic development, the Berkshire Functional Economic Market Area (FEMA) study that underpinned the adopted Local Plan identified Bracknell Forest and Reading being part of a Central Berkshire FEMA, centred on Reading and comprising the authorities of Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead, and Wokingham Borough Council. The Royal Borough of Windsor and Maidenhead is also part of the Eastern Berkshire FEMA, alongside Slough Borough Council. The parties agree the continued relevance of this strategic geography.
- 4.16 The needs for economic development are developed from a range of scenarios in the CDNA, but the need figures on which the LPPU are based arise from the 'blended scenario' minus the safety margin and allowance for future losses, and are as follows:
- 85,803 sq m of office floorspace; and
  - 167,113 sq m of industrial, warehouse and research and development floorspace.
- 4.17 Policy EM1 provides to meet up to this level of need, with the provision for office development expressed as a range between assessed specific capacity and the



identified need. As such, the policy provides to meet full economic development needs for Reading within Reading Borough.

- 4.18 The need for employment land within Bracknell Forest in the adopted Local Plan is based on the study on Employment Land Needs in Bracknell Forest, which, once adapted to the plan period, identified a need for a further 19,125 sq m of office floorspace and 48,875 sq m of industrial and storage/warehousing floorspace between 2020 and 2037. Policy LP20 allocates sites to provide 25,960 sq m of employment development. This does not meet the needs in full, but the plan notes considerable future uncertainty over demand and commits to monitoring take up in order to identify any emerging trends which will be responded to through a Local Plan Review.
- 4.19 The adopted Reading Borough Local Plan (2019) had some scope to meet unmet office needs from elsewhere as identified in policy EM1. However, this situation has changed with the LPPU due to changes to need levels and increased housing need. Reading is now only able to meet its own economic development needs within its boundaries.
- 4.20 The parties therefore agree that the LPPU plans to meet its employment needs in full. The parties also agree to work together to understand changes to need for employment in Bracknell Forest across the plan period and the implications for any unmet need.

#### *Town centres*

- 4.21 The CDNA for Reading found an overprovision of 5,467 sq m of comparison goods floorspace up to 2041 and a very small positive need of 428 sq m of convenience goods. This small positive need can be accommodated by reallocation of existing retail space between comparison and convenience. As such no positive need for new development arises and Policy RL2 plans only for sufficient provision to maintain the vitality and viability of the network and hierarchy of centres. There is no unmet need to be accommodated elsewhere.
- 4.22 The Bracknell Forest Local Plan does not plan for an increase in retail floorspace, due to a variety of reasons, including previous evidence having overstated the degree to which the Lexicon would deliver comparison goods floorspace.
- 4.23 The parties agree that the scale of retail and town centre development planned for does not give rise to particular cross-boundary impacts.

#### **d) Strategic transport infrastructure needs and provision**

- 4.24 The overall transport strategy is set out in Policy TR1 of the LPPU. BFC has no particular concerns with the overall strategy, nor with any of the more specific policies relating to transport, and supports the transport measures set out in the Infrastructure Delivery Plan with the caveat that resulting improvements to public transport includes existing and possible future cross boundary routes travelling to and from Bracknell. The parties agree that engagement on public transport links between the authorities will continue as more detailed proposals emerge.

- 4.25 A Transport Modelling Report has been prepared to support the LPPU which has been provided to BFC for input prior to its finalisation. BFC notes the conclusions of the report and agrees that there are no significant cross-boundary impacts that give rise to particular concerns.

**e) Strategic healthcare infrastructure needs and provision**

- 4.26 The level of growth proposed in the LPPU results in needs for new healthcare provision, which is outlined in the Infrastructure Delivery Plan, and sites in the Partial Update are identified where possible. The parties agree that this will not result in additional cross-boundary implications.

**f) Climate change and mitigation**

- 4.27 The parties have both declared a Climate Emergency – RBC in February 2019 and BFC in January 2023. At the time of declaration, RBC stated its aim for a carbon neutral Reading by 2030. The LPPU contains policies to ensure that development plays its part in achieving this aim, and the parties agree that this approach is sound.

**g) Planning for minerals**

- 4.28 All matters are dealt with in the adopted Central and Eastern Berkshire Joint Minerals and Waste Plan.

**h) Planning for waste**

- 4.29 All matters are dealt with in the adopted Central and Eastern Berkshire Joint Minerals and Waste Plan.

**5. Areas of agreement**

- 5.1 The parties have engaged effectively and on an on-going basis during the plan making process and RBC has fully fulfilled its duty to cooperate with BFC.
- 5.2 The parties agree the following statements of common ground:
- a) The parties agree that the LPPU makes provision to fully meet development needs other than for gypsy and traveller accommodation and the qualification set out in para 4.9 concerning housing.
  - b) The parties agree there is no unmet need for general housing arising from either authority.
  - c) The parties agree that there is an unmet need for gypsy and traveller accommodation arising from Reading Borough and that an open dialogue on this will continue.
  - d) The parties agree that there is no unmet need for employment development arising from Reading Borough, and that the extent of any unmet employment development needs from Bracknell Forest will need to be established through monitoring of take-up.
  - e) The parties agree that there is no unmet need for town centre development arising from either authority.



- d) The parties agree that the evidence supporting the LPPU is robust and proportionate to the plan-making stage of planning.
- e) The parties agree that the overall strategy promoted by the LPPU is sound.
- f) The parties agree that the proposed development allocations are developable in principle, and that remaining detailed design, public and active transport strategies, and highway mitigation, will be considered through the planning application process.
- g) The parties will continue engagement relating to plan-making as appropriate and necessary.

## **6. Areas of further work or disagreement**

- 6.1 Further engagement on Reading's unmet needs for Gypsy and Traveller provision will continue.
- 6.2 Further engagement between the parties will continue on major transport projects insofar as they impact transport links between Reading and Bracknell Forest.

## **7. Governance Arrangements Including Future Review**

- 7.1 The parties agree to:
  - Continue to cooperate and work collaboratively on strategic planning matters that affect both parties including the scale and location of strategic development and necessary infrastructure provision;
  - Keep a dialogue open on Gypsy and Traveller accommodation provision;
  - Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies;
  - Review and update this Statement of Common Ground in the light of any material change in circumstance; and
  - Maintain positive principles of cooperation.

## **8. Signatories**

- 8.1 We confirm that the information in this Statement of Common Ground reflects the joint working and engagement undertaken to date to address identified strategic matters. The parties will continue to work together to address cross boundary issues.

Signed for Reading Borough Council

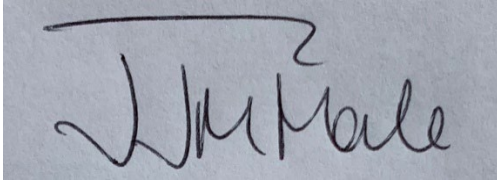


Name: Matthew Golledge

Position: Acting Assistant Director for Planning, Transport and Public Protection

Date: 25 April 2025

Signed for Bracknell Forest Council

A handwritten signature in black ink on a light blue background. The signature is written in a cursive style, with the first part being a large, stylized 'J' that loops around, followed by 'Male'.

Name: Jo Male

Position: Assistant Director: Planning

Date: 06.05.2025

## **Appendix 1: Bracknell Forest Council response to the Pre-Submission Draft Local Plan Partial Update**



Planning Policy Team  
Reading Borough Council  
Civic Offices  
Bridge Street  
Reading  
RG1 2LU

By email to: [planningpolicy@reading.gov.uk](mailto:planningpolicy@reading.gov.uk)

17<sup>th</sup> December 2024

Dear Planning Policy Team,

**Regulation 19 consultation on Reading Borough Local Plan Partial Update**

With reference to the above consultation, I enclose comments from Bracknell Forest Council (BFC).

**HOUSING NEEDS**

The current plan covers the period 2013-2036. Policy H1 includes a requirement for 689dpa over the plan period.

The updated Plan covers the plan period 2023-2041. Updated Policy H1 includes a housing requirement of 825dpa (14,850 total over the plan period), which relates to the capacity of sites in the 'Housing and Economic Land Availability Assessment' (2024).

The updated Policy H1 is less than the local housing need based on the national standard method of 878dpa (15,804 over the plan period, including a 35% urban uplift, based on the December 2020 guidance).

However, Reading Borough Council has undertaken its own housing needs assessment (ORS, July 2024) which identifies a need for 735dpa (13,230 total over the plan period). The NPPF (para. 61, December 2023 version) allows for exceptional circumstances for a local assessment of need. The local assessment uses alternative population and growth assumptions which are more applicable to local circumstances. BFC has no objection to the approach proposed for deriving the local housing need figure, as it is agreed that the 35% uplift for Reading results in a figure which does not fully relate to local need.

**PLACE, PLANNING AND REGENERATION DIRECTORATE**

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD

T: 01344 352000 [www.bracknell-forest.gov.uk](http://www.bracknell-forest.gov.uk)

Furthermore, Policy H1 identifies a greater requirement than set out in the ORS local assessment of housing need (difference of +1,620 dwellings), with the aim of boosting housing delivery.

However, BFC has concerns about how the remaining need (once existing commitments have been deducted) will be addressed in the Plan. The table at para. 4.4.5 (page 100) identifies a remaining need of 6,428 homes. However, the same table (page 101) sets out that sites identified in the plan amount to a capacity of 5,110-7,470 homes. Whilst there is no objection to the principle of identifying a capacity range for each site, if only the minimum range for each allocated site is achieved, this would result in a shortfall of 1,318 homes against Policy H1. Some assurance is sought that the identified sites will meet the requirement in Policy H1 to avoid the issue of unmet need. BFC notes that there are supporting policies on increasing densities of development in locations which are highly accessible by public transport, as well as walking and cycling.

Whilst not raising any point of soundness on approach to how site specific policies are set out, it is felt that the policies themselves (such as SR3) could be clearer if the indicative capacity was referred to within the main policy wording rather than as a footnote, for example (changes shown underlined):

***Development of the South of Elgar Road site will be allocated for 360-540 residential units, with potential for supporting community uses.***

## **GYPSY AND TRAVELLER NEEDS INCLUDING TRAVELLING SHOWPEOPLE**

There are no changes proposed to the wording of Policy H13 'Provision for Gypsies and Travellers'. Policy H13 is a criteria based development management policy, with the supporting text setting out the local need. Paragraph 108 states there is a need (based on a Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment 2017) for 10-17 permanent pitches, a transit site of 5 pitches and 2 travelling showpeople plots. It is made clear in paragraph 109 that these needs cannot be met in Reading Borough and is stated that the Council is exploring options for meeting permanent needs outside the Borough.

No update is provided on whether any progress has been made on meeting needs. However, a change to the target is proposed to the Monitoring Framework in Figure 11.1 from 'TBC' to 'None'. It is not clear why the target does not match the identified need in paragraph 108, even though no sites are allocated.

## **EMPLOYMENT NEEDS**

Policy EM1 is now proposed as a strategic policy, with the net need for office floorspace being reduced to between 30,000 to 86,000 sqm (N.B. there is a typo in 30\_000), and the net need for industrial, warehousing and/or research/development floorspace increasing to 167,000 sqm by 2041. The evidence to support these figures is in the updated 'Commercial Development Needs Assessment' (N.B. a reference remains to the EDNA in paragraph 4.3.4). Changes proposed to the Monitoring Framework are consistent with this latest evidence.

Paragraph 4.3.5 confirms that there is scope to accommodate all identified needs, and the proposed deletion of the 'calculating employment need figures' box is consistent with other proposed changes in the supporting text. It is noted that Policies EM2 and EM3 are proposed to be strategic.

## **PLACE, PLANNING AND REGENERATION DIRECTORATE**

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD

T: 01344 352000 [www.bracknell-forest.gov.uk](http://www.bracknell-forest.gov.uk)

## **RETAIL AND LEISURE NEEDS**

Policy RL2 is now proposed as a strategic policy and the amount of floorspace required has been removed. This follows the results of an updated Commercial Development Needs Assessment which found an overprovision of comparison goods floorspace and only a very small need for convenience floorspace. No gaps in provision were identified for leisure. Changes proposed to the Monitoring Framework are consistent with this latest evidence.

Further clarity would be helpful on the uses listed in paragraph 4.6.16 which lists 'general business uses (E use)' as 'non-centre uses'. In both the Partial Update Plan's glossary (Chapter 12) and in Annex 2 of the NPPF, offices are listed as a main town centre use, and so support for their location in designated centre is implicit (i.e. the sequential test would not be applicable).

The supporting text to Policy RL5 (paragraph 4.6.28) lists impacts that are of particular significance to Reading. It is considered that there should also be a reference to centres outside Reading Borough, where appropriate.

## **TRANSPORT**

The measures outlined in the Infrastructure Delivery Plan are supported by BFC in that they seek to enhance public transport services and continue to promote a third Thames Crossing. This support is on the basis that improvements to Public Transport includes existing and possible future cross boundary routes travelling to and from Bracknell.

## **SUSTAINABILITY APPRAISAL (SA)**

A partial Habitats Regulations Screening Assessment has been undertaken as part of the Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update (Regulation 19) (November 2024). This is included in Appendix 4 of the Sustainability Appraisal (SA) and is summarised in section 5.

Potential impacts on designated sites appear to have been identified for several policies but the assessment is taken no further. It should show what policies (and sites) have been screened in for Appropriate Assessment (AA) and an AA should be undertaken for these policies and sites.

## **CONCLUSION**

In conclusion, whilst it is considered that certain policies and supporting text might benefit from some revisions, the main area of concern relates to the fact that the potential capacity of allocated sites (if the lower figures are achieved) may not meet the outstanding need in the table on pages 100/101.

Concern is expressed that this could prejudice the following tests of soundness:

- Justified (not an appropriate strategy)
- Effective (not deliverable over the plan period)

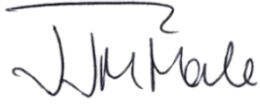
If you have any queries regarding this letter, please contact the Development Plan Team:  
[development.plan@bracknell-forest.gov.uk](mailto:development.plan@bracknell-forest.gov.uk).

## **PLACE, PLANNING AND REGENERATION DIRECTORATE**

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD

T: 01344 352000 [www.bracknell-forest.gov.uk](http://www.bracknell-forest.gov.uk)

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jo Male'. The signature is written in a cursive style with a horizontal line above the first part of the name.

Jo Male

Assistant Director: Planning

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